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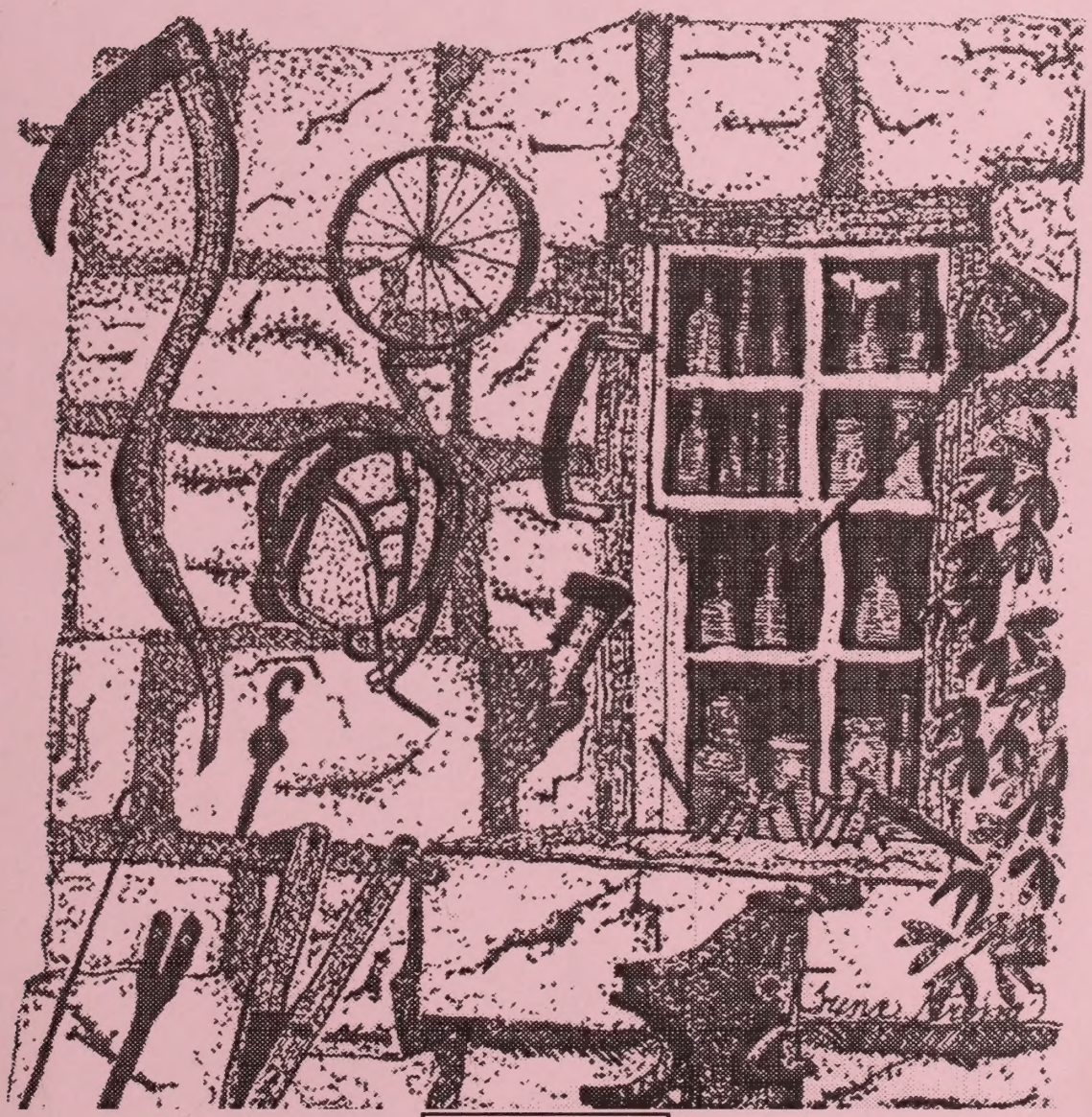
FINAL

Vernal District Office

Spring 1993

Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Volume II



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JARVIE RANCH

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The Bureau of Land Management is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a manner to serve the needs of the American people for all times. Management is based on the principles of multiple use and sustained yield of our nation's resources within a framework of environmental and scientific technology. These resources include recreation; rangelands; timber; minerals; watershed; fish and wildlife; wilderness; air; and scenic, scientific, and cultural values.

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DIAMOND MOUNTAIN RESOURCE AREA

PROPOSED
RESOURCE MANAGEMENT PLAN AND
FINAL ENVIRONMENTAL IMPACT STATEMENT

VOLUME II:

Consultation and Coordination

Prepared by

Department of the Interior
Bureau of Land Management
Vernal District
Spring 1993

David E. Little
District Manager
Vernal District

June 14, 1993
Date

James M. Parker
State Director
Utah State Office

June 17, 1993
Date

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CONSULTATION AND COORDINATION 5

Resource specialists in the Diamond Mountain Resource Area and Vernal District prepared the Diamond Mountain Resource Management Plan/Environmental Impact Statement (RMP/EIS). The Vernal District Office and Utah State Office management teams and resource program leaders provided technical and policy reviews and suggestions.

Consultation, coordination, and public involvement have occurred throughout the process through public meetings, informal meetings, individual contacts, news releases, and *Federal Register* notices.

Initial steps in the process began in 1988 with the development of a preparation plan. Other early efforts included research, inventory, analysis, and interagency coordination.

PUBLIC PARTICIPATION

A public participation plan was prepared to ensure that the public would have numerous opportunities to be actively involved in the planning and environmental process. Both formal and informal input have been encouraged and used.

A notice published in the *Federal Register* in January 1989, indicated the intention of the BLM to prepare a resource management plan and requested information on resources and proposed future uses within the Diamond Mountain Resource Area. Nominations for ACEC consideration were also requested. Letters and a news release requesting information on the potential for occurrence of minerals were mailed in spring 1989.

A news release was issued in September 1989, and notices were mailed to solicit comments on a set of proposed planning criteria.

A news release was issued in January 1991, and a brochure was mailed providing information on the results of the ACEC nomination process and subsequent analysis as well as a brief summary of the alternatives. Invitations to review the Management Situation Analysis and provide nominations for Wild and Scenic River designation were also extended.

The draft Diamond Mountain RMP/EIS was filed with the Environmental Protection Agency (EPA) in December 1991. The EPA's notice of availability, published in the *Federal Register* of January 3, 1992, (page 287) established the 90-day public comment period expiring April 1, 1992. BLM published a notice of availability and an announcement of the public meeting schedule in the *Federal Register* dated December 30, 1991 (pages 67326-67327).

To facilitate review of the draft RMP/EIS, public meetings were held in Vernal, Salt Lake City, Duchesne and Manila during the period January 22 through 30, 1992. A total of about 80 people attended these meetings.

The Vernal District Advisory Council has been kept apprised of the RMP progress, and comments and recommendations of the members have been solicited.

Formal and informal meetings have been held with many members of the ranching and minerals industries and with other interest groups and with Uintah Basin governmental agencies and entities. A summary of comments generated from these meetings is on file in the Vernal District.

CONSISTENCY

Coordination with other agencies and consistency with other plans were accomplished through frequent communications and cooperative efforts between the BLM

and involved federal, state, and local agencies organizations, and the Ute Indian Tribe.

The Utah Governor's Resource Development Coordinating Committee (RDCC) has been heavily involved in the development of this RMP/EIS. Numerous meetings and a field tour were conducted to assure consistency with the state's ongoing plans. The RMP team reviewed the land use plans for Daggett, Duchesne, and Uintah Counties to ensure consistency. BLM personnel have met with the respective county planners and commissioners to promote greater understanding of goals, objectives, and resources of both the counties and the BLM. Additional opportunities to participate were extended to the Ute Indian Tribe and the County Commissioners of the three counties involved.

DISTRIBUTION OF THE RMP/EIS

Approximately 650 copies of the draft RMP/EIS were distributed to federal, state, and local governmental agencies, Ute Indian tribal organizations, congressional and legislative offices, private interest groups and organizations, business institutions, and individuals. Distribution was by volume mailing; however, many copies were also distributed at public meetings and in response to requests for the document. Copies of the document were also available for public review and distribution in the BLM Diamond Mountain Resource Area Office, Vernal District Office, and Utah State Office.

The planning process includes an opportunity for individuals to protest any part of the proposed RMP believed to be in error. Only those persons or organizations who participated in our planning process may protest. A protesting party may raise only those issues which were submitted for the record during the planning process. Protest criteria and procedures are described in the State Director's letter at the beginning of this document.

This proposed RMP/final EIS is being distributed to approximately 700 addresses garnered during the development of the draft and in response to the draft RMP document. The following list is representative of the agencies, organizations, and individuals indicating an interest and participating in the development of the Diamond Mountain RMP. This list is not inclusive. A complete list is on file at the Vernal District Office.

U.S. SENATORS

Senator Jake Garn
Senator Orrin Hatch

CONGRESSIONAL REPRESENTATIVES

Representative Bill Orton District 3

STATE OFFICIALS

Norman Bangerter, Governor

STATE SENATORS

Myrin Alarik, District 26

STATE CONGRESSIONAL REPRESENTATIVES

Beverly Ann Evans, District 55
Dan Price, District 56

FEDERAL AGENCIES

National Park Service
Dinosaur, CO; Jensen, UT;
Washington, DC

National Park Service RMRO
Branch of Compliance
Denver, CO

National Wildlife Federation
Washington, DC

U.S. Air Force Environmental Office-Central
Dallas, TX

U.S. Bureau of Indian Affairs
Phoenix, AZ

U.S. Bureau of Indian Affairs
Uintah and Ouray Agency
Fort Duchesne, UT

U.S. Bureau of Land Management
Green River Resource Area
Rock Springs, WY

U.S. Bureau of Land Management
Price River Resource Area
Price, UT

U.S. Bureau of Land Management
White River Resource Area
Meeker, CO

U.S. Bureau of Land Management
Little Snake Resource Area
Craig, CO

U.S. Bureau of Land Management
Planning Coordinator
Craig, CO; Moab and Salt Lake City, UT

U.S. Bureau of Mines
Denver, CO; Tucson, AZ; Washington, DC

U.S. Bureau of Reclamation
Division Environmental Affairs
Washington, DC

U.S. Bureau of Reclamation
Denver, CO; Salt Lake City, UT

U.S. Department of Energy
Laramie, WY

U.S. Department of Housing and Urban Development
Denver, CO

U.S. Environmental Protection Agency
Denver, CO

USDA, Farmers Home Administration
Roosevelt and Vernal, UT

U.S. Federal Energy Regulatory Commission
Washington, DC

U.S. Fish and Wildlife Service
Colorado River Fisheries
Vernal, UT

U.S. Fish and Wildlife Service
Denver, CO; Vernal, and Salt Lake City, UT;
Washington, DC

U.S. Forest Service
District Ranger
Roosevelt, UT

U.S. Forest Service
Forest Supervisor
Vernal, UT

U.S. Forest Service
Regional Forester
Ogden, UT

U.S. Geological Survey
National Center (423)
Reston, VA

U.S. Health and Human Services
Environmental Health
Disease Control Centers
Atlanta, GA

U.S. Mineral Management
Denver, CO

U.S. Soil Conservation Service
Vernal, UT

STATE AGENCIES

Utah Department of Health
Salt Lake City, UT

Utah Department of Natural Resources
Salt Lake City, UT

Utah Division of Lands and Forestry
Salt Lake City, UT

Utah Division of Oil, Gas, and Mining
Salt Lake City, UT

Utah Division of Transportation
Salt Lake City, UT

Utah Division of Water Resources
Salt Lake City, UT

Utah Division of Water Rights
Salt Lake City, UT

Utah Division of Wildlife Resources
Salt Lake City, Price, and Vernal, UT

Utah Field House of Natural History
Vernal, UT

Utah Geological Survey
Salt Lake City, UT

Utah State Preservation Office
Salt Lake City, UT

Utah State University

Utah Water Research Laboratory
Logan, UT

COUNTY AND LOCAL OFFICIALS

Daggett County Commission
Manila, UT

Duchesne County Commission
Duchesne, UT

Uintah County Commission
Vernal, UT

COUNTY AND LOCAL AGENCIES

Chamber of Commerce
Vernal, UT

Duchesne County Agents
Duchesne, UT

Uintah County Library
Vernal, UT

Uintah County Planner
Uintah Courthouse
Vernal, UT

Uintah County Transportation
Vernal, UT

Vernal City Corporation
Vernal, UT

Vernal District Advisory Council
Vernal, UT

Vernal District Grazing Advisory Board
Vernal, UT

INDIAN ORGANIZATIONS

Ute Indian Tribe
Business Committee
Fort Duchesne, UT

Ute Indian Tribe
Resource Department
Fort Duchesne, UT

Ute Research Laboratories
Fort Duchesne, UT

MEDIA

Cortez Newspapers Inc.
Cortez, CO

Daily Northwest Colorado Press
Craig, CO

Daily Rocket Miner
Rock Springs, WY

Deseret News
Vernal, UT

High Country News
Paonia, CO

KVEL/KUIN News
Vernal, UT

Public Lands Newsletter
Ucon, ID

Vernal Express
Vernal, UT

PUBLIC COMMENT ON THE DRAFT RMP/EIS

During the comment period January 3 through April 1, 1992, 286 letters were received on the Draft Diamond Mountain Resource Management Plan and Environmental Impact Statement. However, several letters were received after the comment period closed and too late to be individually responded to in this document. The concerns and issues raised in these letters have been expressed in other comment letters which have been responded to and which are reprinted here.

In general, the comments were divided on the issue of amount and degree of needed restrictions: 101 letters expressed the draft RMP was not restrictive enough, 90 letters expressed the document was too restrictive. Nineteen letters expressed satisfaction with the present level of management. The majority (52 percent) of those letters received did not state support for any of the alternatives presented. Of the letters expressing an opinion, 69 stated support for Alternative A; 35 for Alternative E; 10 each for Alternatives B and C; and 3 for Alternative D.

Both support and opposition were expressed regarding OHV use designations, wildlife reintroductions and habitat protection, and public access to areas on Diamond

Mountain Plateau. There were five letters strongly opposed to the reintroduction of black-footed ferrets. Approximately 11 letters expressed strong opposition to increased restrictions due to raptor protection/ enhancement prescriptions. Twenty letters were opposed to increases in big game forage assignments at the expense of livestock. Thirteen letters addressed concerns about water rights and restrictions to future impoundments and objected to any wild and scenic river designations. A large number of the comments supported the ACEC designations; however, most believed inadequate protection is provided for these areas; e.g., OHV, mining, and grazing are considered inappropriate uses within an ACEC. Three letters believed inadequate public input was sought during development of the draft. Six comments expressed strong opposition to bear baiting on public lands. Five letters believed the economic analysis was weak and unrealistic.

Input on the RMP/EIS is appreciated, and each comment was considered in the preparation of this proposed plan and final EIS.

Of the 286 letters received, 146 are reprinted here. Each letter was assigned a reference number when it was received for use in responding to comments. Table 5-1 provides an index of all the letters received and references our response. Those letters not reprinted are noted "NR". Specific comments within each letter are referenced by a two-number code (for example 113-3). The first number refers to the letter; the second number refers to a specific comment within the letter. Our responses are referenced by the same code.

Letters not reprinted are represented by identical or very similar letters. For example, Comment Letter 13 is identical or very similar to 32 letters expressing concern about OHV use. Also, many letters included attachments (maps, or other references) which are not reproduced due to space limitations and printing costs. All letters and complete attachments are on file in the area office.

LIST OF PREPARERS

The following lists in alphabetical order the principal players in the preparation of this plan. Numerous other individuals from the resource area, district, and state offices as well as other federal, state, county representatives and public individuals provided valuable assistance in the formulation of this plan. For brevity only, just those district and state office individuals providing major support and assistance are listed. The contributions of those not listed are also deeply appreciated.

Tom Dabbs, DMRA Wildlife Biologist. B.S. Wildlife Management, Humboldt State University, Arcata, California. Member of the core team since its inception covering wildlife, special status animal species, and fire matters. He has worked for 13 years with BLM.

Steve Hartmann, DMRA Supervisory Range Conservationist. B.S. Range Management, University of Montana, Missoula. Member of the core team from its inception covering livestock, soils and water, and vegetation (including special status plant species). He has worked for 14 years with BLM, the last 3 in Vernal.

Tim Ingwell, Vernal District Geologist. B.S. Geology, University of New Mexico, Albuquerque, M.S. Geology, University of California at Los Angeles. Member of the core team from the writing of the RMP/EIS, covering fluid minerals and groundwater concerns. Tim comes from the private sector, with 4 years of experience with BLM.

Dave Moore, DMRA Outdoor Recreation Planner. B.S. Forestry, Utah State University, Logan. Member of the core team from its inception covering recreation (including Wild and Scenic River evaluation) and woodland concerns. Dave also wrote the Cultural Resources and Hazardous Materials sections from information prepared by others. Dave has 27 years experience with BLM.

Jean Nitschke-Sinclear, DMRA Range Conservationist. B.S. Range Management, Utah State University, Logan. Served as Technical Coordinator during development of the draft RMP. Assumed duties of Team Leader following transfer of Penny Smalley. She has worked for 19 years with BLM.

Phyllis Phillips, Vernal District Word Processor Operator. Phyllis performed the monumental task of completing the word processing of the RMP/EIS and all the unseen written documentation behind the document. Phyllis has 7 years experience with BLM.

Dave Plume, DMRA Geologist. B.S. Geology, Metropolitan State College, Denver. Dave assumed the Vernal District GIS Coordinator's responsibilities during the preparation of the proposed plan/final EIS document. As such he had responsibilities for the preparation, analysis format, and depiction of GIS data. He has worked for 5 years with BLM.

Earle Smith, Vernal District GIS Coordinator. B.S. Forestry, Utah State University, Logan; M.S. Forestry, Oregon State University, Corvallis. Earle was GIS Coordinator and member of the core team from its inception through the preparation of the draft RMP/EIS.

Penny Smalley, Vernal District Planning Chief. B.S. Business, University of Colorado, Boulder. Member of the core team from its inception through publication of the draft document serving as Team Leader and management coordinator. Penny has worked for 14 years with BLM.

Kathy Stubbs, Vernal District Realty Specialist. Member of the core team from its inception through the comment period on the draft document, covering lands and realty. She also wrote the air, climate and socioeconomic sections from information prepared by others. Kathy has worked 15 years with BLM. Kathy was instrumental in entering the resource area's myriad land status data into a complicated yet efficient GIS database.

Ron Trogstad, DMRA Area Manager. B.S. Biological Science, University of Utah, Salt Lake City. Member of the core team from its inception, providing coordination and management assistance. Ron has worked 25 years with BLM.

SPECIAL ASSISTANCE

Vernal District Office

Tanya Bullock, GIS Coordinator. Tanya assumed the duties of GIS Coordinator following the transfer of Earle Smith during the preparation of the draft document.

Keith Chapman, Soils Scientist. Keith formulated the soils and surface water information in the Management Situation Analysis and oversaw the input of soils and watershed information into the GIS database.

Gerald Kenzcka, Petroleum Engineer. Jerry formulated the fluid minerals section of the Management Situation Analysis and oversaw the input of the fluid minerals data into GIS.

Dwain Nelson, Range Conservationist. Dwain assisted in the mapping of soils inventory and ecological condition information in the Diamond Mountain and Three Corners areas of the resource area.

Blaine Phillips, Archeologist. Blaine formulated the cultural and paleontological section of the Management Situation Analysis and oversaw the input of such information into GIS.

Kyle Smith, Cartographic Technician. Kyle inputted spatial inventory information into the GIS database for use by the team.

Jo Ann Stroh, Computer Specialist. Jo Ann prepared the graphics and photographics for presentation. She also developed the interactive computer system for use during review.

Ray Tate, Public Affairs Officer. Ray lent his editorial assistance and wrote news releases during the planning process.

Joy Wehking, Vernal District Supervisory Realty Specialist. Joy provided technical and editorial assistance in the presentation of the lands and realty sections of the proposed plan.

Karl Wright, Hydrologist. Karl assisted in the inputting of riparian, floodplain, and watershed data into the GIS database. He also aided in the formulation of the Soil and Water section of the Management Situation Analysis.

Utah State Office

Carla Garrison, Cartographer. Carla provided technical oversight for the digitizing of the original information into the GIS database.

Don Gray, Supervisory Cartographer. Don coordinated the mapping effort at the State Office level.

Steve Howard, Planning Coordinator. Steve provide technical oversight on the various facets of the planning effort and coordinated state office input and support.

Lynn Roth, Cartographer. Lynn provided technical coordination and oversight for preparation of the maps in the proposed plan/final EIS.

Jack Sheffey, GIS Coordinator. Jack provided training, support, and guidance in the use of GIS as an analysis tool.

Kezia Snyder, Writer Editor. Kezia provided technical editing to the proposed plan/final EIS document.

Bill Wagner, Physical Scientist. Bill prepared the air and climate sections of the Management Situation Analysis. Bill also provided assistance with Hazardous Materials information.

Jeff Williams, Economist. Jeff provided the socio economic data and analysis on the proposed plan/final RMP.

Others

The Bureau's Phoenix Training Center provided us with many of the graphics and drawings used in this document.

Patti Britton designed the chapter headings from an original 1870 survey photo of Swallow Canyon by USGS surveyor W.H. Jackson (333a).

Mary Read lent her expertise in impact analysis during the final phase of the draft document's preparation.

Trina Strong provided the artwork for the cover.

Debbie Wheeler and Corinne Jacobsen drew the vegetation artwork used in the document.

OTHER ASSISTANCE

Vernal District

David E. Little, District Manager
Bruce Aldridge, Cartographer
Howard Cleavinger, Assistant District Manager Minerals
Duane DePaepe, Environmental Coordinator
Dean Evans, Assistant District Manager Lands and Renewable Resources
Elizabeth Goode, Assistant District Manager, Administration
Gary Hunter, Assistant District Manager Operations
Ed Wehking, Fire Management Officer

Utah State Office

Mike Barnes, Land Law Examiner
George Diwachak, Environmental Scientist
Jim Fouts, Geologist
Terry Graham, Writer-Editor
Maggie Kelsey, Environmental Specialist
Howard Lemm, Deputy State Director Mineral Resources
Bob Lopez, Land Law Examiner
Dick Page, Natural Resource Specialist
Gary Peterson, Cartographic Technician
Shelley Smith, Archeologist
Ted Stephenson, Chief, Branch of Operations
Randy Weatherly, Computer Programmer
Jeff Williams, Economist

TABLE 5-1:
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
1	U.S. Dept. of Housing & Urban Development (Kutzer)	1-1
2	U.S. Air Force (Bruntmyer)	2-1
3	Permits West, Inc. (Wood)	3-1 - 3-46
4	J.C. Brewer	4-1
5	U.S.D.I. Bureau of Mines (Grabowski)	5-1
6	Utah Nature Study Society (Hovingh)	6-1 - 6-16
7	Eagle Outdoor Sports (Mumford)	7-1 - 7-4
8	Utah Division of Wildlife Resources (Moretti)	8-1 - 8-20
9	Frank W. Myers	9-1
10	Paul Shaffer *This letter is very similar to 1 other on OHV use*	10-1
11	Allen Crane	11-1
12	Marilyn Beesley	12-1
13	Larry Holm *This letter is identical to 33 other letters on OHV use*	13-1
14	Dale Larsen (NR)	13-1
15	Cameron Adams (NR)	13-1
16	John Ormond (NR)	13-1
17	John Harlan (NR)	13-1
18	Mark and Vicki Whiting (NR)	13-1
19	LeGrande Bunker (NR)	13-1
20	S. Gleason (NR)	13-1
21	Donald Burgener (NR)	13-1
22	Michael E. Foster (NR)	13-1
23	Paul K. Jensen (NR)	13-1
24	Guy Green (NR)	13-1
25	Dennis Moyes (NR)	13-1
26	G. R. Jones (NR)	13-1
27	Dan Thomas (NR)	13-1
28	Ed Oldroyd (NR)	13-1

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
29	Larry W. Kreider (NR)	13-1
30	Rodell F. Eggett	30-1 - 30-3
31	Jim Paugh *This letter is identical to 1 other letter on access*	31-1
32	Brock Roberts (NR)	13-1
33	Steve Hancock (NR)	13-1
34	William Johnson (NR)	13-1
35	R. M. Stokes (NR)	13-1
36	Daggett County Commission	36-1 - 36-4
37	Cindie and Dan Wynn (NR)	13-1
38	P. J. Edmunds (NR)	13-1
39	E. Sherman Barrus (NR)	13-1
40	George H. Silkworth (NR)	13-1
41	Alan D. Calderwood (NR)	13-1
42	Charles S. Paugh (NR)	31-1
43	Ken Sharp (NR)	13-1
44	Kent and Patti Booker (NR)	13-1
45	U.S. Forest Service, R-4 (Reynolds)	45-1
46	G. Howard Abplanalp	46-1 - 46-6
47	C. Lawrence and Rhoda T. DeVed	47-1 - 47-2
48	James N. Evans (NR)	13-1
49	Marilyn K. Scott	49-1
50	Jim Toering (NR)	13-1
51	Richard Guy (NR)	13-1
52	U.S.D.A., Soil Conservation Service (Holt)	52-1 - 52-4
53	Eleanore Hacking Scott	53-1 - 53-3

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
54	Forest Industries (Kornfeld)	54-1
55	Wendy May *This postcard is identical or very similar to 32 others on OHV use.*	55-1
56	Becky Bridger (NR)	55-1
57	James C. Fisher (NR)	55-1
58	Kenneth L. Evans (NR)	55-1
59	Meg Hatch (NR)	55-1
60	Joseph R. Brown (NR)	55-1
61	Mindy Jochems	61-1 - 61-5
62	Alvin Kay	62-1
63	Lawrence C. Kay	63-1 - 63-2
64	Cliff Mindrump (NR)	13-1
65	W. Chuck (NR)	55-1
66	LaDell and Gladys Slaugh (NR)	55-1
67	Gregory E. Jochems	67-1 - 67-3
68	Grant L. Hacking	68-1 - 68-4
69	Mildred B. Hacking	69-1 - 69-2
70	Clint McKnight	70-1 - 70-3
71	W. Slaugh (NR)	55-1
72	Bryce Chappell (NR)	13-1
73	William John Kremin, III	73-1
74	Utah Chapter, Sierra Club (Osborne)	74-1 - 74-6
75	Sandra H. Ely	75-1 - 75-5
76	Tim Hadlock	76-1
77	Brenda Durant	77-1 - 77-6
78	Claudia Cox	78-1

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
79	Lorin Squires	79-1 - 79-5
80	Clifford & Lenora Smith	80-1 - 80-12
81	Jex Terry (NR)	55-1
82	National Park Service (Snyder)	82-1 - 82-22
83	Carl & Myrna Cobbs	83-1
84	Dustin Henline	84-1
85	Karl J. Baese	85-1
86	Tracy Henline	86-1
87	Nolan Massey	87-1
88	Allan Holmes	88-1
89	Mac W. Holmes	89-1
90	Moon Lake Electric Association (Winder)	90-1
91	Nicki Wake	91-1 - 91-2
92	Wilderness Society, Central Rockies Region (Leeson)	92-1 - 92-9
93	Mark Berry (NR)	55-1
94	Gary Simper (NR)	55-1
95	Ellan B. Reynolds (NR)	55-1
96	Uintah Special Service District (Wardell)	96-1 - 96-2
97	Delilah & David Badger	97-1
98	Larry & Tamara Twitchell (NR)	55-1
99	Adrian K. Reynolds (NR)	55-1
100	Debbie & Scott Storie	100-1
101	David & Stacy Ely	101-1
102	Steve Kreek	102-1
103	Uintah Mountain Club (Borton)	103-1 - 103-4

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
104	Allan E. Smith	104-1 - 104-11
105	Daniel J. Ely	105-1
106	A. Rex Gardner	106-1
107	Alex Radosevich	107-1 - 107-11
108	Ruth L. Wake	108-1
109	U.S. Diversified Group (Saxauer)	109-1 - 109-7
110	Uintah County Commissioners	110-1 - 110-12
111	Questar Pipeline Company (Blackham)	111-1 - 111-6
112	Michael Goddard *This letter is identical or very similar to 75 others on management of the Red Mtn-Dry Fork area*	112-1
113	Michael Goddard, #2 (NR)	112-1
114	State of Utah, RDCC	114-1 - 114-41
115	Lauri Keller (NR)	112-1
116	Vernal District Advisory Council (Beers)	116-1 - 116-12
117	Scott Williams	117-1 - 117-5
118	Bonnie Bernard	118-1 - 118-7
119	Berdie Vernon (NR)	112-1
120	Lance Slaugh (NR)	112-1
121	Dusty Slaugh (NR)	112-1
122	Kori Johnson (NR)	112-1
123	Jim Johnson (NR)	112-1
124	Terry Stout (NR)	112-1
125	Morgan Hall (NR)	112-1
126	Timothy O. Jones (NR)	112-1
127	Virginia D. Hall (NR)	112-1
128	Susan Boren (NR)	112-1

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor		Refer to Response Number(s)
129	Jean McKenzie	(NR)	112-1
130	Martin Pennington	(NR)	112-1
131	Mary Ann Raymond	(NR)	112-1
132	Mark Raymond	(NR)	112-1
133	Ronald G.Walker	(NR)	112-1
134	Don Hullinger	(NR)	112-1
135	Don Johnson	(NR)	112-1
136	Michael S. Burris	(NR)	112-1
137	A.J. Pease	(NR)	112-1
138	Susan Pease	(NR)	112-1
139	Ranee Feltch	(NR)	112-1
140	Mark Feltch	(NR)	112-1
141	Vern F. Moore	(NR)	112-1
142	Juanita Moore	(NR)	112-1
143	Roger T. Guy	(NR)	112-1
144	R. Wall	(NR)	112-1
145	John M. Silva	(NR)	112-1
146	Iliff E. Gardner	(NR)	112-1
147	Fern Gardner	(NR)	112-1
148	Madelene Stout	(NR)	112-1
149	Greg McKenzie	(NR)	112-1
150	Rita Keddy	(NR)	112-1
151	David F. Keddy	(NR)	112-1
152	Harold Shelley	(NR)	112-1
153	Beth J. Murphy	(NR)	112-1

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
154	Kim McKenzie (NR)	112-1
155	Jineal Shelley (NR)	112-1
156	Doug Murphy (NR)	112-1
157	Nancy Jaussi (NR)	112-1
158	Feza Hullinger (NR)	112-1
159	Faye Phillips (NR)	112-1
160	Jesse D. Phillips (NR)	112-1
161	Curt Jaussi (NR)	112-1
162	W. Lester Hullinger (NR)	112-1
163	Becky De Col (NR)	112-1
164	Robin De Col (NR)	112-1
165	Rebecca Larsen (NR)	112-1
166	Marvin Larson (NR)	112-1
167	Paul Wake	167-1 - 167-7
168	Dinaland Snowmobile Club (Hatch) *with a petition on OHV use.*	168-1 - 168-5
169	Utah 4-Wheel Drive Association (Davidson)	169-1 - 169-4
170	Lynn Burton	170-1 - 170-3
171	Berkley Jesse Hall	171-1
172	Linda West	172-1
173	Dick Winters (NR)	112-1
174	Barbara H. Hall	174-1 - 174-4
175	Vernal Chamber of Commerce (Perry)	175-1 - 175-7
176	Hunting & McCarrell	176-1 - 176-14
177	Brent Hansen	177-1 - 177-12
178	Lamont Moon	178-1 - 178-13

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
179	Daggett Soil Conservation District (Ruble), *This letter is identical to comment letter 226*	179-1 - 179-52
180	Utah Trail Machines Association (Huck)	180-1 - 180-2
181	Roy Krubsack	181-1 - 181-3
182	Carol McClellan (NR)	112-1
183	Brad McClellan (NR)	112-1
184	Glen McConkie (NR)	112-1
185	Glen J. Mecham (NR)	112-1
186	Diane Mecham (NR)	112-1
187	Johnnie Dickens (NR)	112-1
188	J.A. Dickens (NR)	112-1
189	Day DeLaHunt	189-1 - 189-4
190	Vernal Chamber of Commerce (Foley)	190-1
191	Tom Elder	191-1 - 191-6
192	Norman Pease	192-1
193	Clif & Pam Whitmire	193-1 - 193-3
194	David P. Olson	194-1 - 194-6
195	State of Utah, Division of Parks and Recreation (Bilbey & Hamblin)	195-1 - 195-5
196	Ron Raunikar	196-1
197	James Thompson	197-1 - 197-7
198	Allen Crane #2	198-1
199	Joel R. Holifield (NR)	55-1
200	William McKee (NR)	55-1
201	Bruce Boney (NR)	55-1
202	Brian McNamara (NR)	55-1
203	Don R. Scott (NR)	55-1

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor	Refer to Response Number(s)
204	David Beers	204-1
205	Russ Perry *This letter is identical to 3 letters dealing with the Red Mountain-Dry Fork area*	205-1 - 205-6
206	Sara Perry (NR)	205-1 - 205-6
207	Sally and Ronald K. Wackowski	207-1 - 207-3
208	Jennifer Hall	208-1 - 208-2
209	Marcia Borton	209-1 - 209-3
210	Amelia M. Hall	210-1 - 210-2
211	A. Allen Bennion	211-1
212	EXXON Company, USA (Goddard)	212-1 - 212-4
213	Rita Wetenkamp (NR)	205-1 - 205-6
214	James Garcia	214-1 - 214-10
215	Heather Campbell	215-1 - 215-5
216	Dwayne W. Holmes	216-1 - 216-7
217	Ralph Siddoway	217-1 - 217-4
218	Scott Chew	218-1 - 218-6
219	Lyle Taylor	219-1 - 219-3
220	Ernest J. & Linda E. Holmes	220-1
221	Darlene Johnson	221-1 - 221-5
222	George & Maxine Miller	222-1
223	Department of Energy, WAPA (Tomsic)	223-1 - 223-2
224	Chevron USA, Inc. (Newville)	224-1 - 224-3
225	McCoy Sheep Company (McCoy & McCoy)	225-1 - 225-8
226	Diamond Mountain Permittees *This letter was signed by approximately 200 permittees and private landowners on Diamond Mountain. These signatures are available for public review at the Vernal District Office.* (NR)	179-1 - 179-52
227	Lynn Siddoway	227-1 - 227-8
228	Uintah Mountain Club, Natural Resources Committee (Durant)	228-1 - 228-21

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor		Refer to Response Number(s)
229	Lynn Silcox	(NR)	55-1
230	N.S. Cook	(NR)	55-1
231	Kyle Smuin	(NR)	55-1
232	Janet Moon	(NR)	55-1
233	W. Donate	(NR)	55-1
234	Garth Horrocks	(NR)	55-1
235	C. C. Lewis	(NR)	55-1
236	Kathy Maxson	(NR)	55-1
237	Matt Fellows	(NR)	55-1
238	James Gate	(NR)	55-1
239	Ted Freestone	(NR)	55-1
240	James W. Lytle	(NR)	55-1
241	Hacking & Mugleston		241-1
242	R. Drink	(NR)	12-1
243	Robert Fallon		243-1 - 243-4
244	Brent Hacking		244-1 - 244-4
245	Douglas Hacking		245-1
246	Janet T. Millikan		246-1 - 246-6
247	James Kay		247-1 - 247-2
248	Duchesne County Commission		248-1 - 248-2
249	Ronald J. Younger		249-1 - 249-3
250	Michael A. Martin		250-1 - 250-2
251	Environmental Protection Agency (Dodson)		251-1
252	Uintah Basin Archeology Club (Mantle)		252-1 - 252-5
253	Celsius (Jepperson)		253-1 - 253-2

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor		Refer to Response Number(s)
254	Timothy J. Sweeney	(NR)	112-1
255	Texaco, USA (Burritt)		255-1 - 255-5
256	Margaret Pettis		256-1 - 256-2
257	Don Hatch		257-1
258	Blue Ribbon Coalition (Cook)		258-1 - 258-9
259	Rocky Mountain Oil & Gas Association (Moseley)		259-1 - 259-7
260	American Rivers (Cassidy & Wood)		260-1 - 260-10
261	George & Gloria Fasselin		261-1
262	Jeri Helco	(NR)	112-1
263	Ronald & Marjorie Reynolds	(NR)	112-1
264	Richard J. MacDonald	(NR)	112-1
265	Curtis, Arlene, & Lillyan May	(NR)	112-1
266	Joseph M. Gondek	(NR)	112-1
267	Wayne and Shirley Ann Bullock	(NR)	112-1
268	Greta and David Speir	(NR)	112-1
269	Judy and Ross Gipson	(NR)	112-1
270	Rod H. and Denise P. Edwards	(NR)	112-1
271	Douglas Rosendahl	(NR)	112-1
272	Raymond and Illa Bascom	(NR)	112-1
273	Vicki B. Garcia	(NR)	112-1
274	Kaye and Gerald Stewart	(NR)	112-1
275	George and Ruby McBride	(NR)	112-1
276	Ronald and Sherry Hatch	(NR)	112-1
277	David and Julie Jensen	(NR)	112-1
278	Utah Wilderness Association (Macfarlane)		278-1 - 278-16

TABLE 5-1: (Continued)
LIST OF REPRINTED COMMENT LETTERS ON THE DIAMOND MOUNTAIN DRAFT RMP/EIS

Letter Number	Commentor		Refer to Response Number(s)
279	Ellen Davis	LATE (NR)	
280	Magic Valley Trail Machine Association, Inc. (Mai)	LATE (NR)	
281	Jim Gardner	LATE (NR)	
282	Jan Ellen Burton - LATE	LATE (NR)	
283	Allan J. Peterson	LATE (NR)	
284	Jocelyn Spendlove	LATE (NR)	
285	Leslie Brunell	LATE (NR)	
286	Ute Indian Tribe of the Uintah & Ouray Reservation (Thompson)	LATE (NR)	

Comment Letters on the Diamond Mountain Draft RMP

U.S. Department of Housing and Urban Development

Denver Regional Office, Region VIII
Executive Tower
1405 Curtis Street
Denver, Colorado 80202-2349

January 3, 1992

Ms.Penelope Smalley
Team Leader, Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

Dear Ms. Smalley:

This is in response to you request for comments on the Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the Diamond Mountain Resource Area in Daggett, Duchesne, and Uintah Counties, Utah.

1-1 Your Draft RMP/EIS has been reviewed with consideration of the areas of responsibility assigned to the Department of Housing and Urban Development. This review considered the impact of the Preferred Alternative E on housing and community development in this three county area. Within these parameters, we find this Draft RMP/EIS adequate for our purposes.

If we may be of further assistance, please contact me, or Mr. Myron Eckberg, Environmental Protection Specialist, at FTS 564-3102.

Sincerely yours,

Howard S. Kutzer
Regional Environmental Officer
Office of Operational Support

RESPONSE TO COMMENT LETTER 1 (HUD, Kutzer)

1-1 Thank you for your comment.

DEPARTMENT OF THE AIR FORCE
AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE (AFCEE)
REGIONAL COMPLIANCE OFFICE, CENTRAL REGION
[illegible] S. GRIFFIN STREET, BOX 110
DALLAS, TEXAS 75202-0086

07 JAN 1992

Mr. James M. Parker, State Director
Utah State Office Bureau of Land Management
P.O. Box 45155
Salt Lake City, UT 84145-0155

Dear Mr. Parker:

Thank you for providing us the opportunity to review and comment on your draft Resource Management Plan and Environmental Impact Statement for the Diamond Mountain Resource Area, Utah.

2-1 Our review indicates that no Air Force military training routes presently exist directly within the study area mentioned above. Therefore, no potential conflicts are known to exist between the missions of our respective agencies. We have no specific comments to offer except to express concern for the affect your land management decisions might have upon the continued military use of this special use airspace, the established routes, and establishment of future routes.

Training routes and airspace requirements of the military do occasionally change, although it is not anticipated that significant changes to these routes will occur in the immediate future. Mission requirements, fuel costs, and environmental constraints all contribute to decisions made in locating a military training activity. Because of general aviation and population pressures, low altitude, high speed flights are relegated to those areas least accessible and sparsely inhabited. Therefore, we would appreciate your full consideration on how the planning and management decisions of your agency might adversely affect the use of low altitude airspace by the Air Force.

As the Air Force's regional point of contact for such matters, we are available to assist in establishing liaison between your office and the appropriate Air Force activities should a conflict ever arise. We hope this information is useful in your planning process. Thank you for the opportunity to review the document provided. I look forward to the continued communication with your office. If additional information is needed, please contact me at (214) 767-4668 or FTS 729-4668.

Sincerely,

Raymond L. Bruntmyer
Regional Compliance Officer

Cy to: HQ USAF/CEVP
Refuge Manager

RESPONSE TO COMMENT LETTER 2 (U.S. AIR FORCE, Bruntmyer)

2-1 No restrictions of military overflights are outlined in the proposed plan.

PERMITS WEST, INC.

PROVIDING PERMITS for the ENERGY INDUSTRY

37 Verano Loop, Santa Fe, New Mexico 87505 (505) 984-8120

January 31, 1992

Jean Nitschke-Sincleer, Team Leader
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Ms. Nitschke-Sincleer:

I prefer Alternative D in the Diamond Mountain RA RMP. My comments, by page, follow.

3-1 T.1: Third paragraph says rights will not be challenged. This is too kind a light. The RMP will impact rights. The value of an oil lease is based on its utility. Reducing its utility (e.g., season of use) reduces its value. To what extent will the RMP reduce the value of existing leases?

3-2 1.1: Paragraph 3 says BLM will not dictate split estate land uses unrelated to federal minerals. This implies BLM will dictate land uses related to federal minerals. However, page 2.10 says BLM will impose stipulations only with landowner's approval. How do you reconcile the two statements?

3-3 T.6: Why doesn't the second paragraph discuss the impacts of too little availability.

3-4 T.8: To what extent will valid existing rights be changed but not precluded (4th paragraph)?

3-5 T.11: Who will determine at what point "additional restrictions" (paragraph 8) preclude valid existing rights? What will be the lessees recourse?

3-6 2.4: Who are the members of BLM's "paleontological advisory group" (paragrpah 1)? What is their decision making deadline?

3-7 2.10: What happens to the stipulations if the surface owner sells the land (pargraph 2)? What happens if there is more than one owner and they cannot agree?

3-8 2.19 et al: How many acres per month are subject to the seasonal restrictions in Tables 2-4, 6, 8, 10, and 12? (The last table is misnumbered on page vii.)

3-9 2.26: Level 3 says "half-mile or line-of-sight". Who determines which restriction applies? Is it whichever is more, or whichever is less? How does this affect the acreage totals?

3-10 2.27: Why is such a small proportion of the RA in Category 1 in Table 2-9?

3-11 2.37: What makes rafter noise more acceptable to raptors than other noise? What are the population goals for raptors? When are there enough raptors to lift restrictions? Are restrictions perpetual?

3-12 2.38: Why require a mile buffer? It is excessive and unnecessary if there are topographic barriers or intervening disturbances (e.g., road). Will restrictions apply if the peregrine is de-listed?

3-13 2.48: Why aren't surface shots allowed in Level 1 and 2 lands?

3-14 2.54: Who determines what is a practical alternative to disturbance in a riparian zone? What role will economics play in a determining practicality?

RESPONSE TO COMMENT LETTER 3 (PERMITS WEST, INC., Wood)

3-1 The RMP would affect new oil and gas leases through the use of oil and gas lease stipulations and notices attached to the lease, and existing oil and gas leases through the use of conditions of approval on new actions. Such stipulations, notices, or conditions of approval will not reduce the value of the existing oil or gas resource, but may in some instances increase the costs to extract the resource.

3-2 The statement you refer to has been changed to read: "It will usually be necessary to apply the same standards for environmental protection of split estate lands as would be used for federal surface. BLM will consider carefully the views of the surface owner and the effect on the owner's use of the surface from implementation of possible mitigation measures, as well as, the effect such measures would have on attaining other program goals."

3-3 The preceding paragraph states that the value or usability of some resources is diminished if the lands are not accessible either legally or physically.

3-4 Please refer to our response 3-1, above.

3-5 The District or Area Manager establishes the site specific conditions under which exploration, development, and abandonment will be permitted on specific leases, and determines if stipulation waivers, exceptions or modifications are warranted. All site specific determinations must conform with the RMP and are established in the process of approving notices of intent, applications for permit to drill, field development plans, utilization plans and permits, sundry notices, and reclamation plans. Activity planning related to other resource programs addressees the impacts, if any, of the fluid minerals program on that resource or activity and the impacts of any conditions or restrictions on the fluid minerals program.

3-6 The statement you refer to has been removed from the document. However, for clarification, the "paleontological advisory group" referred to is headed by the State of Utah's Paleontologist with members consisting of recognized experts in the area of paleontological resources. Deadlines for recommendation from this group are established on a case-by-case basis.

3-7 The stipulations on an oil and gas lease will remain in effect on the federal mineral estate unless the federal mineral estate is disposed of from federal ownership, the sensitive resource values protected by stipulations no longer exist, or an RMP plan amendment or new RMP is approved.

3-15 2.112: Why can't similar ecosystems in Dinosaur National Monument serve as a control in lieu of Lears Canyon? Why must BLM have its own?

3-16 2.114: Why is spring boating allowed in Alternative E, but barred in Alternative D (page 2.108)? Why can't line of sight be used in lieu of the up to 2 mile distances cited for bird protection zones? What method was used to calculate why a sage grouse needs 1,000' but a peregrine needs 1 mile?

3-17 2.118: Since no surface occupancy (NSO) is the most restrictive management, how can NSO lands fall into Level 2? What type of seismic work will be allowed on Level 1 and 2 land in Browns Park? Why not add a row listing the number of acres and per centages of land in each level for each area?

3-18 2.119: Why isn't NSO used in lieu of no leasing on Level 1 land in the Red Mountain-Dry Fork?

3-19 3.7: If there are all these negative impacts to wildlife, why are elk increasing (Page 3.11)?

3-20 3.9: How many acres are in the "best potential" areas for ferret reintroduction?

3-21 3.11: Why is only the Kung study footnoted in the first paragraph but mutiple studies are cited? What type of controls (time, place, type of disturbance) were used in the study(ies)? Is the Kung study anecdotal or a true scientific experiment? On what basis can it be applied to other raptors?

3-22 3.15: Why is it implied in the fourth paragraph that steep or vertical banks preclude fish? I suspect the numbers are right, but the text is tortured.

3-23 3.51: How significant (i.e, what % of county income) are the PILT monies? I suspect counties would prefer BLM land to be privately owned and fully taxable.

3-24 3.52: Why isn't a table provided showing the % of wages due to each economic sector?

3-25 3.53: A table shows the economic value of recreation. Why isn't there a table showing the economic value of oil and gas?

3-26 4.3: Why doesn't the second paragraph acknowledge that cattle too can be herded away from water?

3-27 4.5: Why is no mention made of secondary recovery for oil wells?

3-28 4.7: Why limit gilsonite exploration to warm weather?

3-29 4.14: Will BLM change its preferred alternative, which has a net loss of 152 jobs, in view of the President's State of the Union speech?

3-30 4.47: Why increase protection for elk when they're increasing anyway (page 3.11)?

3-31 4.47: How much of the historical impacts to sage grouse are due to BLM chaining sagebrush?

3-32 4.47: How many acres, jobs, wells, etc. will be impacted by raptor protection zones?

3-33 4.50: How does BLM know that the ferruginous hawk nest abandonment is due to gas wells?

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY

3-8 Please refer to Table 2-15 for specific seasonal dates and acreages by alternative.

3-9 The restriction you refer to should read "line-of-sight of the river up to one half mile, whichever is less". The acreage totals used in the analysis were calculated this way.

3-10 Of all the alternatives besides Alternative A, Alternative D offers the most lands open to oil and gas leasing under standard terms and conditions. The amount of lands which would fall into Category 1 is a function of the amount of restrictions to oil and gas activities. Alternative D has the least number of restrictions to oil and gas activities and therefore the greatest amount of lands open to oil and gas exploration/development.

3-11 Rafting was analyzed as a short term disturbance (<1/2 hr) that was kept within a raft on the water. This short term disturbance was judged not to cause raptors to be displaced from nesting sites. Only raptors which are federally listed as endangered, threatened, or candidate species are included in the RMP. The population goals for these species are to re-establish self-sustaining populations throughout their ranges. The Bald Eagle Recovery Plan, for example, calls for the initial goal of 1,200 occupied breeding areas distributed over a minimum of 16 states by the year 2000, with an average annual productivity of at least 1.0 young per nest occupied. It is believed when these population goals are achieved, such needed restrictions will be re-evaluated and if appropriate, removed.

3-12 The American Peregrine Falcon Recovery Plan, adopted by USF&WS, BLM, USFS, and other federal and state agencies, recommends restricting human activities and disturbance between February 1 and August 31, which occur within 1 mile of nesting area. We do not anticipate the peregrine to be delisted during the life of this RMP. Please refer to Table 2-15 for the modified restriction for peregrine falcons in the proposed plan.

3-13 In the proposed plan, significant surface disturbance will not be allowed on level 1 and 2 lands. Refer to Chapter 2 for a listing of resource values protected under level 1 and 2 lands in the proposed plan.

3-14 BLM has the responsibility of determining what is or is not a practicable alternative. Economics would be considered, but would not be the sole determining factor.

3-15 The designation of the 1,400-acre Lears Canyon relict vegetation site as an Area of Critical Environmental Concern is consistent with the directive of The

3-34 4.50: Why impose the burden of sage grouse protection on minerals when the bulk of the impact has been by BLM? A thousand acres of sagebrush removed by chaining has no where near the economic benefits of a thousand acres removed for mineral development.

3-35 4.53 Why does mineral development increases archeological vandalism, but providing access to 77,800 acres of landlocked public land (page 4.57) decreases the rate?

3-36 4.55: How often does BLM seed following firewood gathering?

3-37 4.55: How many oil and gas field acres will be impacted by raptor protection zones?

3-38 4.56: On what basis did BLM calculate only an additional 25% cost? If a ferret colony is in the middle of a proposed half mile long pipeline, the minimum extra length required to avoid the colony would be 40%. Is surface disturbance allowed within a quarter mile of ferrets if it occurs outside the given time period? How may wells would not be drilled, how many people not employed, and how many royalties and taxes foregone if ferrets are introduced with the proposed restrictions? What are the quantified negative socioeconomic impacts of introducing ferrets on BLM instead of NPS land?

3-39 4.58: What is the background rate of soil erosion? Without the background rate, how are we to judge whether saving 20,250 tons is worth the cost of more restrictions?

3-40 4.61: Why aren't there totals for the rows and columns in the tables?

3-41 4.62: Why are the numbers of increased recreation jobs mentioned, but the number of lost oil and gas jobs not mentioned?

3-42 A2.9: Ferrets stand a far better chance of success if restrictions focus on significant impacts, i.e., dogs and prairie dog eradication. If BLM's approach had been used on bald eagles, they'd all be dead from DDT. I see no discussion of feral dog control. Rather than restrict people, allow them to shoot any dogs and prevent dog problems. Turn foes into friends. Why trap ferrets that wander from the reintroduction area? Maybe they know something you don't. Why should industry bear the burden of all surveys? There is no incentive for BLM to be prudent in their decision to require surveys. Why not industry pays if any are found, and BLM pays if none are found? The last known wild colony was found in an oil field. Don't require more than is needed.

3-43 A3.2-10: Why not use a map to show restrictions? The list forces you to go through 8 pages.

3-44 A8.44: What chemical, besides napalm, is used that would affect markers?

3-45 A8.45: Will gates allow others besides "recreators" to pass?

3-46 The RMP favors pristine style recreation at the expense of mineral development. There are already ample recreation opportunities in the Uintah Basin. BLM need not provide a full spectrum of recreation when others have already done so. A less myopic approach is needed.

Brian Wood

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY

Federal Land Policy and Management Act of 1976. This act provides that designation of ACECs be given priority in the development of land use plans. The management prescriptions outlined in the proposed plan could be significantly different than prescriptions proposed by the National Park Service, thus providing significantly different and invaluable information to the scientific community.

3-16 Alternative D has been changed to allow for spring boating. The 2-mile protection zone around sage grouse strutting grounds is used to protect the 60-80% of all nests which are located within that 2-mile zone. This 2-mile buffer and the 1,000 foot buffer around strutting grounds are adopted as guidelines for sage grouse protection by the Western States Sage Grouse Committee of which BLM is a partner. We also recognize UDWR as the authority on wildlife population management in Utah. Please refer to Table 2-15 for the wording of wildlife imposed restrictions of the proposed plan.

3-17 The most restrictive management to oil and gas exploration/development would be closure of the lands to oil and gas leasing and not NSO (no surface occupancy). Lands which would carry NSO stipulations are classified as Category 3 lands and generally fall into level 2 (careful management). Geophysical surveys which do not involve significant surface disturbing methods would be considered in level 1 and 2 areas.

3-18 In the proposed plan the lands in the Red Mountain-Dry Fork area are classified as category 3 (open to leasing subject to no surface occupancy and similar major constraints) and Category 2 (open to leasing subject to seasonal or other minor constraints).

3-19 The sentence has been changed to read: "...have documented sensitive wildlife, such as mountain lion, ferruginous hawk, and black bear responses to increased human activity."

3-20 33,500 acres are in the "Best Potential" areas for ferret reintroductions. In the proposed plan, Eight Mile Flat, containing 16,600 acres, would be the only site managed for black-footed ferret reintroduction unless one of the other sites proves more acceptable. See Table 2-15 for a more detailed discussion.

3-21 This sentence has been corrected by adding additional references used in the RMP. The Kung study documented the presence of a pair of ferruginous hawks during courtship and nest selection at the beginning of an oil and gas field development process. This study documented the abandonment of the area by this pair with no further use documented since 1989. The Kung study can only be

applied to ferruginous hawks, but the additional studies listed refer to the other raptors of concern.

3-22 The sentence in reference to streams and watercourses that reads "The remainder has steep cliffs or bluffs meeting the stream or course edge, precluding any riparian vegetation", has been deleted.

3-23 PILT monies have provided the counties with additional revenues. Please refer to Chapter 3, socioeconomics section, and Appendix 10 for a clarified discussion of the importance of PILT monies.

3-24 Please refer to the expanded socioeconomics sections in Chapters 3 and 4 and Appendix 10. We believe these new sections provide a much clearer picture and analysis of the socioeconomics affected by the proposed plan and alternatives.

3-25 Please refer to our response 3-24 above.

3-26 Sheep normally have a herder with them continually while out on the range, where as cattle usually do not. However, herding cattle is a management option for protection of riparian areas.

3-27 Enhanced or secondary recovery of oil is discussed in Chapter 4 and Appendix 4.

3-28 The assumptions section does not describe limitations which would be prescribed by the proposed plan. Instead, it describes a scenario we believe would be most likely. In this case we meant that typical exploration activities could be successfully completed in a single season.

3-29 Again please refer to 3-24 above.

3-30 Under Alternative D, habitat protection for deer and elk would be reduced, not increased, in time from present management. Current seasonal restrictions apply from December 1 to June 15 under Alternative A. Under Alternative D, they are reduced to December 1 to April 30. Also restrictions would not apply if animals are not present or impacts could be mitigated through other management actions (refer to Chapter 2).

3-31 The sage grouse habitat (1,300 acres) referred to on the Myton Bench, is in semi-desert habitat which BLM does not plan to chain. BLM historically has probably contributed to loss of habitat for sage grouse, but we have no documented acreage figures on this.

3-32 In the high potential oil and gas lands in DMRA, there are currently only two special status raptor species present which receive protection. No surface occupancy stipulations to protect golden eagle nest sites would impact approximately 2,200 acres of high potential oil and gas lands in the Myton Bench-Nine Mile Canyon Region and would preclude 1 well. NSO stipulations to protect ferruginous hawk nest sites would impact approximately 170 acres of high potential oil and gas lands in the Horseshoe Bench-Ashley Valley Region and would not preclude any wells.

3-33 The statement in Chapter 4 refers to the Duchesne Oil & Gas Field. Peter Kung (Biological Consulting and Survey) completed a ground raptor survey for Coors Energy in 1989 in the Duchesne Oil & Gas field. His survey documented an abandoned nesting attempt by Ferruginous hawks as oil and gas drilling activities were increasing. Ferruginous hawks have not used the area during the past 3 nesting seasons (1990-92). This information indicates that a threshold level of disturbance has been reached wherein the ferruginous hawks will no longer tolerate the encroachment of increased oil and gas development activities within their territory.

3-34 We feel the bulk of the impact to sage grouse has come from sage brush removal on private lands on Diamond Mountain (refer to the discussion of sage grouse in Chapter 3). Sage grouse habitat protection and management will need the cooperation of all public land users, including BLM, to be effective, not just minerals.

3-35 The statement you refer to on mineral development and vandalism has been removed from the document. Providing limited access to landlocked blocks of public land would in all likelihood be an insignificant impact on cultural resources. Our analysis now supports this explanation.

3-36 Commercial firewood sale areas are reseeded in the fall each year following completion of a sale. Areas where personal use firewood is collected are not generally reseeded because there is normally very little surface disturbance and excellent natural recovery of the understory vegetation.

3-37 Please refer to our response to 3-32 above.

3-38 The proposed decision involving BFF has changed from the draft. Please refer to Table 2-15 for the proposed decision. Also please refer to the socioeconomic section of Chapter 4 for further information.

3-39 The current annual sediment yield in the Myton desert and semi-desert area averages approximately 1 ton of soil per acre per year. This figure was used to measure soil erosion impacts and was added to Chapter 3 as an average annual sediment yield loss.

3-40 These tables now reflect total for each row and column. The emphasis of the these tables was to point out the cumulative impact in each defined oil and gas producing region.

3-41 This particular statistic has been dropped. Please refer to the clarified socioeconomics sections in this document.

3-42 We agree with your comment on feral dogs and refer you to Appendix 2, last row, which says no other free roaming dogs would be allowed within established reintroduction areas except livestock herding dogs. Black-footed ferrets that wander from protected reintroduction areas may be left on their own if approved by the USF&WS and other management agencies involved. No protection would be afforded them in these areas though. When our timeframes for surveys are not quick enough to meet user needs, they have the option to privately complete the survey work.

3-43 In the approved RMP and Record of Decision document, a map will be provided that will outline the oil and gas categories in detail. We believe the list provided in the appendix to be sufficient for the draft document. The resource maps in Chapter 3 may be used to provide a generalized location of where restrictions would be imposed.

3-44 Chemical application should not affect legal markers. This statement has been deleted.

3-45 The word "recreators" has been changed to "the public" in the paragraph on Fencing in Appendix 8.

3-46 Lands administered by BLM offer recreational opportunities not available on National Forest Service or National Park Service lands in the tri-county area. There is a wide variation in recreation opportunities between alternatives. A summary of impacts to mineral development for the proposed plan and each alternative can be found in Chapter 4.

February 6, 1992

Gentlemen,

After discussions with BLM employees, land owners, public land users, fellow sportsman and others, and after several days of studying the draft proposals, the Book Cliff Sportsman Group would like to make the following recommendations concerning the Diamond Mountain Resource Management plan.

4-1 We are generally satisified with the present management system and therefore recommend adoption of Alternative "A".

Alternatives "B, C, & D" all favor one specific group at the expense of others and are not acceptable to us. Alternative "E" would be beneficial to wildlife but would be more expensive to implement and would also cause an additional burden on natural resources. We feel that most of the benifits of Alternative "E" can still be acheived under the present multipal use management plan.

For Book Cliff Sportsman Group

J. L. Brewer

J. L. Brewer

RESPONSE TO COMMENT LETTER 4 (Brewer)

4-1 The proposed plan would provide 5,000 more AUMs for wildlife, more seasonal protection for special status species and sage grouse, increase acres available for black-footed ferret reintroductions and allow moose reintroductions. The proposed plan would also allow antelope releases on Diamond Mountain, and increase the areas available for bighorn sheep reintroductions. These are significant changes from Alternative A that would not be realized if current management continued.

United States Department of the Interior

BUREAU OF MINES
INTERMOUNTAIN FIELD OPERATIONS CENTER
P.O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

TAKE PRIDE IN AMERICA

February 4, 1992

Memorandum

To: Penelope Smalley, Team Leader, Bureau of Land Management
Vernal District, 170 South 500 East, Vernal, UT 84078

From: Acting Chief, Intermountain Field Operations Center

Subject: Review of Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the Diamond Mountain Resource Area, Duchesne and Uintah Counties, Utah

As requested by your agency, personnel of the Bureau of Mines, Intermountain Field Operations Center, reviewed the subject document. With a management plan such as this, this Bureau is primarily concerned that impacts on mineral resources and related production facilities are adequately addressed.

5-1 Mineral resources, past production, anticipated development activity, and expected impacts on mineral resources and future development are addressed for each of the alternatives presented. Accordingly, all concerns of the Bureau of Mines have been addressed. The preferred alternative (E) will have significant negative impacts on the availability of mineral resources in both high and moderate potential areas and development of tar sands would be precluded. The impacts of Alternative E on mineral resources appear significantly more severe than the existing situation (Alternative A) in the resource area. We believe these additional restrictions should be reconsidered in light of the economic impacts they would have in the region.

Richard B. Grabowski

ekp/rr

RESPONSE TO COMMENT LETTER 5 (BUREAU OF MINES, Grabowski)

5-1 We agree that there are higher levels of impacts to mineral resources under the proposed plan than under the existing management. Some of the proposed decisions have been modified or clarified from the draft, based on public comment, allowing for greater management flexibility. These added modifications should alleviate some of the concerns regarding the restrictions, while maintaining or properly mitigating for the identified important resource values occurring in the area.

UTAH NATURE STUDY SOCIETY

721 Second Avenue
Salt Lake City
Utah 84103

February 6, 1992

Penelope Smalley, Team Leader
Bureau of Land Management, Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Team Leader:

Concerning the Diamond Mountain Resource Area: Resource Management Plan and Environmental Impact Statement.

I was very impressed with Chapter 4 in which management actions of each concern addressed the affect on other concerns. All too long I have witnesse a hierarchcal arrangement of management affects in which wildlife was at the bottom.

The concerns I am addressing revolves mostly around riparian/floodplains and aquatic resources.

6-1 Page 1.9: Fish and Wildlife Habitat Management. Please consider the Utah Natural Heritage Program operating out of the Utah Department of Natural Resources. This program is concerned with plants and wildlife other than those administered by the Utah Division of Wildlife Resources.

6-2 Page 2,11. Riparian Management: There is some concern here about jurisdictional management or biological management. Likewise there is concern whether floodplains or a political determination of riparian management will occur. These concerns are amplified by the definition of the protective zone elsewhere in the text of 600 feet, 700 feet, or 330 feet. This protective zone definition of not manageable with respect to livestock grazing and the protective zone should include the entire floodplai

6-3 Likewise the goal (Figure 3-4, page 3,48) is applicable only to mountain streams and not to desert streams which experience flash flooding, less precipitation and hence more reliance on riparian-generated ground water, and more insolation,and evaporation. An example of the difference between the two systems is that by deforesting the desert riparian system (cutting the Fremont cottonwoods either by wood gatherers or beaver means that desert shrub (greasewood or tamarisks) will replace the forest, unlike the mountain riparian system which may be able to evolve to a climax condition,

RESPONSE TO COMMENT LETTER 6 (UTAH NATURE STUDY SOCIETY, Hovingh)

6-1 We appreciate your comment and will consider the Utah Natural Heritage Program as a source of information for fish and wildlife habitat management.

6-2 The 600', 700', and 330' buffer zones analyzed for the alternatives in the draft pertain to biological management. These zones indicate where management would be restricted to maintain or enhance riparian habitat values. Floodplains are protected by Executive Order 11988. We believe the Bureau's current riparian policy of a 300-foot buffer is adequate for the protection of the riparian values. Please refer to Chapter 2, under livestock in Management Guidance Common to the Proposed plan and Alternatives.

6-3 Yes, this figure applies to riparian areas on perennial streams with the potential to produce the vegetation illustrated.

-2-

6-4 Page 3.7. Indicator Species and their associated habitats. Although indicator species is an excellent hypothetical idea used to monitor the various habitats, it is largely non-functional in application because there is no baseline data on the species, the species are rare or endangered and thus do not indicate what is occurring in the lower food chain, or the animals are hunted and hence managed artificial. Grant (Great Basin Naturalist 46: 469-507, 1986, Wildlife Distribution and Abundance on the Utah Oil Shale Tracts 1975-1984- a reference that should have been cited and whose first page is enclosed) shows great changes in the rodent fauna over ten years which are not reflected in other animals. The rodents would make a far better indicator species as they reflect cycles and plant productivity and are less mobile than the hunted deer and elk.

6-5 Although amphibians are not that abundant in the aquatic system of the Green River drainages, they are more abundant in these locations than in the entire Great Basin where their numbers are next to non-existence. Two species, the Woodhouse Toad and the Leopard Frog should be monitored in the aquatic systems in order to obtain baseline data while this type of data is still available. The disappearance of amphibians in the Great Basin is indicative of entire riparian habitat destruction (largely by cattle) and other species of mollusks have likewise declined in these same regions.

6-6 Page 3.47 . Riparian Resources. Although one can "improve" riparian habitats as at Pariette Wash by "20 impoundments" for waterfowl and shorebirds and provide habitat for these groups of birds where no habitat had previous existed, such views of the improvements can be misleading if one examines mollusks, amphibians and other aquatic dependent animals. Such improvements at Fish Springs National Wildlife Refuge in the Great Basin is thought to have lead to the extinction of an endemic snail. Although the Green River drainages are very different from the Great Basin in endemic aquatic fauna, one should be very careful before any manipulation of aquatic resources occurs in arid regions and this care should extend to a thorough biological survey.

6-7 Page 4.2: "Demands for wildlife habitat (consumptive and non-consumptive) will increase on public lands as private lands are developed and associated wildlife habitat altered". Yet some of the best management riparian habitats are found on private lands as indicated by unique species which have been extirpated from public lands (observed commonly in the Great Basin). Likewise public lands, even with their Resource Management Plans seem to have no control over dispersed recreation and woodcutting- events that are not necessarily good for wildlife. And wildlife neither respects the boundaries of private or public lands or county and state lands and goes where the getting is good. An overall perspective of wildlife is needed.

6-8 Page 4.20. How can 3 inches of growth be maintained in riparian habitats by cattle unless cattle are herded?

6-4 We appreciate your comment and agree. When we revise our Management Indicator Species list, we will be adding a few rodents and less species which are hunted and thus artificially managed. Our emphasis with this first list was to identify species we did have data on and thus the use of deer, elk, and pronghorn antelope.

6-5 We concur with your suggestion. The Woodhouse toad and leopard frog have been be added to our MIS list for aquatic habitats.

6-6 One of the management objectives for Pariette Wetlands set out in the 1979 activity plan was to monitor animal community changes in reaction to habitat type conversions made during the course of the plan's implementation. The mammal and bird studies are complete with only amphibians and reptiles left to complete.

6-7 We agree that an overall perspective of wildlife on both public and private lands is needed. We agree that most riparian areas are in private ownership and in all manner of ecological conditions. It is important that public riparian areas be managed as an integral part of the entire riparian system. For example, we have completed cooperative agreements with UDWR, private landowners, and the SCS on sage grouse habitat management which has worked well.

6-8 The 3 inches refers to average height of herbaceous vegetation as shown by monitoring utilization. Herding or removing livestock may be required when this guideline is reached.

6-9 Appendix:
A 2.1 #3. Culverts should not be routinely used except in seasonal flow streams. Bridges should be build that provide the continuity of the riparian habitat under the road. Why force riparian dependent animals into the arid lands at dangerous road crossings?

6-10 A 4.2. Has any oil and gas fild ever been reclaimed as deplicted in the illustration?

6-11 Appendix 6. Riparian policy of 1988. Guideline #1. Woody plants must be reproducing. This is applicable to high-elevation riparian habitats, but for reproduction to occur in arid streams, seasonal flooding must occur. If flooding does not occur, only tamarisks will survive at the expense of cottonwoods and willows.

6-12 Guideline #5. Reduce heat loss and icing during cold winter months. Could this guideline be explained?

6-13 A 8.45. Seeps and springs. "Some water would be left at the original source for wildlife purposes". This is an excellent management guideline providing that wildlife includes the small animals as mollusks. Likewise the original source should be fenced to prevent large animals as wild horses from impacting the spring.

6-14 Wildlife escape device is very important and these have to be monitored. Often I have seen drowned wildlife (kestrels, spadefoot toads, rodents, sheep) in watertroughs with escape devices implying unsatisfactory design.

6-15 A. 8.44. I would hope that vegetative manipulations as chainings, chemical treatments, and burns, and firewood harvesting would not occur in riparian and floodplains zones. In fact, a buffer zone beyond these areas should be respected as there is some inter-dependence between the riparian and floodplain area and the arid lands adjacent to these areas.

6-16 Although I have most of my experience in biological surveys of amphibians, leeches, and mollusks in the Great Basin, I have examined upper Duchesne River and I am well familiar with the White River and somewhat familiar with Desolation, and Yampa Rivers. Waters in arid regions continue to be impacted by humans. Yet riparian management is presently in fashion. Members of Utah Nature Study Society strongly support sound management of aquatic sources such that no further extirpations of aquatic dependent animals occurs. This management must reflect on biological needs and not on jurisdictional or guidelines proclamations.

Sincerely,

Peter Hovingh

Peter Hovingh, Chairman
Issues Committee

Utah Nature Study Society

6-9 The intent of the reference in Appendix 2 is to keep impacts to riparian and aquatic habitats to a minimum, as stated. We do not routinely use culverts on stream crossings, preferring to use low water crossings that require less maintenance and do not disrupt the continuity of the riparian habitat. We construct very few bridges. The same minimum disturbance factors to riparian habitat would apply to bridge construction as well as stream crossings.

6-10 Yes, there are many successful site rehabilitation projects following completion of oil and gas drilling activities. The example in Appendix 4 is just one illustration of the oil and gas operation process.

6-11 These are general guidelines and do not apply to ephemeral streams or washes that do not have the potential or capability to meet riparian objectives.

6-12 The more vegetation biomass on a stream, the more heat is retained during the winter months. Heat retention will reduce ice buildup which may cause scouring damage to vegetation and stream banks and insure open water for a longer period of time, benefiting terrestrial and aquatic wildlife.

6-13 Original sources of springs where riparian vegetation occurs would be maintained or improved, complying with the Utah State Riparian Policy as shown on in Appendix 6. DMRA has an on-going program of fencing riparian springs where needed and leaving some of the water on-site.

6-14 Wildlife escape devices will be installed on all new and existing water tanks or troughs (refer to the management common to the proposed plan and all alternatives in Chapter 2). We agree these escape devices must be observed and maintained periodically to insure design is correct and the devices are in proper working order. The error in the sentence under Water Pipelines has been corrected to read: "A wildlife escape device would be installed in all watering troughs capable of providing small animal escape ramps to prevent accidental drownings."

6-15 Vegetation manipulation would not occur within riparian buffer zones unless to maintain or enhance riparian values. A standard operating procedure, outlined in Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives states: "Management practices are designed to meet vegetation standards which will maintain or improve watersheds."

6-16 We agree.

Eagle Outdoor Sports
River Trips
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February 3, 1992

Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078
Attn: Jean Nitschke-Sinclear (Team Leader)

Dear Jean,

It was my pleasure to meet you the other night at the open house in Salt Lake City in connection with the Diamond Mountain RMP. I appreciate the time you and the other team members spent with me in reference to my questions as well as making me more aware of the vast amount of work that has gone into this study.

Let me first state that I support the preferred alternate "E" management plan. From my study of the Draft plan and from the discussions at the open house, I believe that alternate "E" is the best overall plan. There are a couple of areas on the alternate "E" plan that I question pertaining to their level of management. I believe that these areas in question may have been small analysis errors or simply overlooked.

Area # 1 (as noted on the map and circled in blue ink)

7-1 This area seems to have be a small acreage of land that perhaps was overlooked but has been listed as level 4 - open management status. This small tract of land is located directly adjacent to a larger area that has been given level 2 - careful management status. All around this tract of land is level 3 - active management status with the exception of the more closely monitored level 2 - careful management status.

Opinion: It is inconsistent with surrounding area to have a small tract of land, such as this, to be listed as open management. I believe that it should have been at least given the level 3 - active management status.

Area #2 (as noted on the map and circled in blue ink)

7-2 This area also seems to have been another small acreage of land that perhaps was overlooked and given the level 4 - open management status. This small tract of land is located directly adjacent to National Forest Land and is surrounded by lands with a level 3 - active management status. From looking at the maps, this area may be partly on a hill but is still very close to critical deer wintering range. From talking to Tom Dabbs, he could not recall any reason why, from a wildlife viewpoint, the land would not have been given the same management status as those surrounding lands.

RESPONSE TO COMMENT LETTER 7 (EAGLE OUTDOOR SPORTS, Mumford)

7-1 The RMP team independently delineated the resource values and management levels they felt necessary and this data was then merged. In some instances, this exercise created management "slivers" as you describe. The small tracts of open management you refer to bordering careful and active management levels are the result of that independent analysis. Specifically, the area identified as Area 1 in your letter (for the general reader, this area is located on the northeast slope of Home Mountain in Clay Basin, Daggett County) has been assigned a management level of 4, or open. The area lies between the semi-primitive nonmotorized area on top of Home Mountain, designated level 2, and crucial deer and elk winter range in Clay Basin, designated level 3. We feel current management prescriptions adequately protect the resources present. Increased protection can be placed on these area if conflicts arise. Currently data does not present a justification for more restrictive management .

7-2 The small tract of land identified as Area 2 in your letter (located between Red Creek and Ashley National Forest in Browns Park) has been reclassified level 3.

(2)

7-2 Cont. **Opinion:** Again, it is inconsistent with surrounding area to have a small tract of land, such as this, to be listed as open management. Due to the critical wintering grounds for mule deer, I believe that it should have been at least given the level 3 - active management status.

Area #3 (as noted on the map)

This area of land is the largest of those in question amounting to several hundred acres. It boarders Dinosaur National Monument and is the only land bordering DNM that has level 4 - open management. The management classification on this tract of land appears to be inconsistent with the rest of the alternative "E" findings. I would like to point out specifically why this is, in my opinion, misclassified.

1.- This is the only land adjacent to the Dinosaur National Monument that has level 4 - open management status.

2.- The current and present existing management plan have this specific area of land classified at the highest level within the existing plan, that of a level 2 - careful management. There are other lands near this land that have level 4 - open management under the current management plan. Why in the alternate "E" plan have all the surrounding lands been proposed to have at least the same management or more restrictive management except this one tract of land which goes from a level 2 - careful management to a level 4 open management? 7-3

3.- The map 3-3 within the draft plan shows that this area of land is a high sensitivity zone for paleontological findings. All other areas within the study that have a paleontological high sensitivity zone are classified with at least a level 3 - active management rating.

4.- The map 3-5 within the draft plan shows that this area of land is a high priority area of land pertaining to elk habitat.

5.- The map 3-6 within the draft plan shows that this area of land is a high priority area of land pertaining to mule deer habitat.

6.- The map 3-7 within the draft plan shows that this area of land is a high priority area of land pertaining to pronghorn antelope habitat.

7.- This area is next to the critical sagegrouse strutting areas and habitat areas as noted on map 3-8.

8.- The map 3-12 within the draft plan shows that this area of land has a moderate potential for oil and gas. Open management could allow in the future, oil or gas exploration to take place within this tract of land.

7-3 The area you question adjacent to Dinosaur National Monument has been classified as level 3 in the proposed plan, identifying it for active management because of sensitive paleontological values. Proposed activities adjoining the monument would be closely coordinated with the National Park Service to avoid unduly compromising the resource values or management objectives within the monument.

(3)

7-3 Cont.

Opinion: The fact is, this tract of land, as I titled it area #3, is critical to several species of wildlife, and was identified as a high sensitivity zone for paleontological findings. This coupled with the fact that this land is located next to the National Monument should also require at least a more restrictive management plan than open management. The study also revealed that this area has a moderate potential for oil or gas development. This should be further cause for alarm to at least establish this land at a level 3 - active management and perhaps more appropriately a level 2 - careful management. Where this tract of land is presently under a management plan of a level 2 - careful management, I believe that it should continue with a level 2 classification especially in light of the additional needs and values the study has revealed pertaining to this tract of land.

7-4

Alternate "E" Buffers: Finally, I would like to question something that exist in the alternative "E" plan. There are a few areas of level 1 - restricted management that are bordered by level 4 - open management. If there are sufficient reasons to classify an area of land as level 1 - restricted management, why would lands right next to this highest level of restrictive management be classified a level 4 - open management. Does it seem logical to have one area of land that has the highest restriction and then right adjacent to it have open management?

Opinion: I believe that there should be a buffer zone of a reasonable distance between level 1 - restricted management area and level 4 - open management areas. There are not very many areas where this occurs, but where it does, I believe a buffer zone would be justified. If a buffer zone is appropriate in cases of level 1 to a level 4, would it also be logical to have a buffer between level 2 - careful management areas of land and level 4 - open management areas of land as well. These buffer zones could be simply going down to the next level of management, in terms of control, and having a protective distance similar to the sagegrouse strutting areas and habitat areas.

I appreciate the opportunity to voice my support, questions, and opinions, in regards to the draft Diamond Mountain RMP. Although I am involved in river running on the Green River, the areas of concern that I have in regards to this management plan and my opinions have nothing to do with the Green River or its' corridor. I do, however, enjoy this area very much and believe that the new management plan will help to further protect these lands for future generations.

Thank you for you interest.

Sincerely,

Rex Mumford

Rex Mumford

7-4 Please refer to our response 7-1, above. During the planning process the idea of buffer zones were discussed, but dropped in the belief that the management proposed for the levels is sufficient in themselves to protect the critical resource values, while allowing for resource use in surrounding areas.

Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Timothy H. Provan
Division Director

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

Southeastern Region
455 West Railroad Avenue
Price, Utah 84501 2829
801 637-3310

February 12, 1992

Jen Sinclair
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Penelope:

The Division of Wildlife Resources Southeast Regional Office has reviewed the draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the Diamond Mountain Resource Area. We have the following comments, concerns, and recommendations. These comments are regional in perspective and should be considered in conjunction with comments from the Northeast Regional Office which will address issues specific to that region.

8-1 Within our regional boundary, only the southern most portion of the Diamond Mountain Resource Area (DMRA) is included. Although the area is small, it contains what we feel to be critical management areas within the DMRA. These areas include Argyle Ridge, Argyle Creek, Nine Mile Canyon, Nine Mile Creek, lower portions of the Green River and portions of Myton Bench. These areas are inhabited by a wide variety of wildlife species and are areas of critical wildlife habitat. The utilization of these areas for recreation, livestock, and mineral exploration present challenges in wildlife management.

The following are comments on each alternative:

Alternative A

8-2 This alternative places seasonal restrictions on activities occurring in sage grouse nesting areas and peregrine falcon nesting habitat, but the restrictions are not adequate. Restrictions on sage grouse nesting habitat should be from mid March through June and peregrine restrictions should be from February through August.

8-3 Page 2.18 (paragraph 4) states that surface-disturbing activities would be allowed within the 600-foot riparian buffer zone if there was no practical alternative. However, there is no mention of mitigation measures if such activities were to take place. Riparian habitats are critical to most wildlife species. Loss of

an equal opportunity employer

RESPONSE TO COMMENT LETTER 8 (UTAH DIVISION OF WILDLIFE RESOURCES, Moretti)

8-1 Thank you for your comment, we agree.

8-2 We recognize the existing seasonal restrictions adopted in 1979-81 are not adequate for sage grouse protection. We have made changes in the proposed plan (refer to Table 2-15) which expand the protective restrictions on sage grouse nesting habitat and peregrine falcons.

8-3 Mitigation requirements were added (refer to Table 2-15). Management common to the proposed plan and all alternatives, in Chapter 2, outline the various laws relating to soil and water management, including the Federal Pollution Control Act of 1972, as amended. We have further defined this mandated authority to include Section 404 of the Clear Water Act and the Federal Manual for Identifying and Delineating Jurisdictional Wetlands of 1989. We would coordinate with the Corps of Engineers if loss of wetlands is unavoidable. We would not manage to lose wetlands at Pariette.

8-3 Cont. such habitat is a severe negative impact caused by surface-
Ms. Penelope Smalley disturbing activities. The BLM's Riparian Area Management Policy states that long-term losses of riparian habitat must be mitigated. If this alternative is chosen, mitigation measures must be included in Environmental Assessments tiered to this RMP. We believe a statement referring to coordination between your resource area and the Army Corps of Engineers would be necessary before any decision document is signed concerning potential loss of jurisdictional wetlands.

Alternative B

8-4 This alternative would be the alternative of choice by the Division of Wildlife Resources (DWR). It provides for active management of wildlife populations and wildlife habitat. It provides for restriction of activities which would adversely affect wildlife species. This alternative also provides the greatest protection to critical wildlife habitats and wildlife species which are threatened, endangered, or in need of special attention. From a wildlife perspective, this would be the preferred alternative.

Alternative C

8-5 While this alternative provides restrictions on sage grouse strutting grounds, no protection zone is described. This alternative also lacks adequate seasonal restriction of activities for sage grouse nesting areas and peregrine falcon nesting areas. Sage grouse restrictions should be from mid March through June and peregrine restrictions should be from February through August.

8-6 This alternative does not provide for protection of potential bighorn sheep and black-footed ferret reintroduction sites. This should be included in the DMRMP as these are animal species requiring special consideration. Existing BLM Habitat Management Plans for this area outline actions for the reintroduction of bighorn sheep and black-footed ferrets (Page 2.7) and should be considered in this RMP.

8-7 Any additional AUMs realized through range improvements would be assigned to livestock. We realize that this is the objective of this alternative, but not allocating any of the additional AUMs for wildlife makes this alternative unsatisfactory.

8-8 The riparian buffer zone is only 330-feet in this alternative. While this provides for some protection of these sensitive areas, a 600-foot or greater buffer zone would be preferred. There is no mention of mitigation for riparian habitat loss when such loss is unavoidable. Mitigation must be considered for riparian losses.

8-4 Thank you for your comment.

8-5 - 7 The following response covers comments 8-5 through 8-7. Alternative C was developed to manage ecological systems for forage production for livestock. The proposed plan would provide protection for sage grouse and the peregrine falcon. Bighorn sheep and black-footed ferrets were viewed as restricting livestock opportunities in this alternative, thus reintroductions and transplants were accordingly not proposed. The proposed plan would provide for the reintroduction of both bighorn sheep and black-footed ferrets.

8-8 Please refer to the BLM Utah State Riparian Policy in Appendix 2, guideline 2. BLM believes restricting surface disturbance within the 330-foot buffer from riparian vegetation will adequately protect this resource.

Jen Sinclair
February 12, 1992
Page 3

Alternative D

8-9 Concerns regarding this alternative are similar to those expressed under Alternative C. There is no protection zone outlined for sage grouse strutting grounds. Seasonal restrictions are not adequate for sage grouse and peregrine falcons. Additional AUMs acquired through range improvements are assigned to livestock with none assigned to wildlife. The intent of this alternative is to minimize wildlife restrictions to mineral exploration and development. Impacts from these activities often have a negative effect on most wildlife species. These impacts must be considered in the RMP. Page 2.5 (paragraph 8) states that it is the BLM's responsibility to recognize opportunities to maintain, improve and expand wildlife habitat. Activities related to mineral exploration and development often conflict with this objective. Alternatives which minimize negative impacts on wildlife should be considered.

Alternative E

8-10 This alternative provides for the best implementation of multiple use of the resource area. The DWR supports the effort to protect wildlife and the environment while providing for the development of other resources. We would suggest that wildlife be considered initially for additional AUMs developed from range improvements. Page 2.30 (paragraph 7) states that these AUMs would initially go to livestock. Experience has shown that it is difficult to assign AUMs to wildlife that were previously assigned to livestock. We would also suggest that the riparian buffer zone be expanded from 330-feet to 600-feet as in Alternative A. This would allow for greater protection of critical riparian areas.

The following comments may apply to several of the alternatives:

8-11 -- While this area is potential peregrine falcon habitat, no known eyries occur within the DMRA. Monitoring should occur to identify areas of future use by peregrines. DWR is concerned that prairie falcons and goshawks were omitted from the list of raptors occurring in the area. There are known locations of these species in the Nine Mile Canyon area. The Northern goshawk is a USFWS category 2 species requiring special management. The prairie falcon is a raptor of special concern. Ferruginous hawks, also a USFWS category 2 species, are located within the DMRA. A 0.5 mile buffer zone around active nests and seasonal restrictions from April through July would be required for these species. DWR would also like to emphasize the presence of golden eagles in the area. DWR would like raptor surveys conducted prior to implementation of management activities.

8-9 Under Alternative D, mineral exploration and development are emphasized and those activities restricting or impeding the development of minerals are not minimized. Special status species would receive the same considerations in all alternatives, but opportunities to maintain, improve, and expand other wildlife habitat would only be allowed if it did not negatively impact the minerals programs.

8-10 If there is not a need by wildlife to use additional available forage over livestock preference in crucial wildlife habitat, these AUMs could be given to livestock, if needed, on a temporary, nonrenewable basis. This non-renewable use may be issued on an annual basis (refer to Table 2-15). We believe the Bureau's current policy of restricting surface disturbing activities within the 330-foot zones, as stated in the proposed plan, would adequately protect the riparian areas within the resource area.

8-11 We continue to monitor many raptor species including the peregrine falcon in cooperation with UDWR annually. The goshawk, golden eagle, and prairie falcon, as well as all special status animal species, are listed in Chapter 3, as management indicator species for specific habitats. Habitat objectives have been established to monitor these species and assess the affects of the current management decisions. Raptor protection zones are outlined in Table 2-15 of this document. We have adopted these zones from UDWR recommendations and have added them to Appendix 4 of this document for clarification.

Jen Sinclair
February 12, 1992
Page 4

8-12 -- Seasonal restrictions on critical elk and deer winter ranges would not be required if animals were not present on the site (Page 2.35). For short term activities this would be acceptable, however, for long term activities we are concerned with this statement. Although animals may not be present one year, if an area is designated as critical winter habitat, then use has occurred in the past and is likely to occur in the future. Allowing activities with long term impacts could cause elk and deer to be displaced into poor quality habitats.

8-13 -- While surface disturbing activities and OHV use are not allowed within sage grouse buffer zones, grazing is allowed (Page 2.36). Seasonal restriction of grazing within the outlined buffer zones from March 1 to June 30 should be considered. Guidelines adopted by DWR, BLM, and USFS state that a two mile buffer zone be established around sage grouse leks and protected from vegetative treatments. Sage grouse populations and habitat are declining. This species provides unique hunting and viewing opportunities and critical habitats such as leks and nesting areas need to be protected.

8-14 -- In order for adequate habitat to be maintained for possible bighorn sheep reintroduction, domestic sheep must be excluded from these areas. Disease is a major contributor to bighorn sheep population declines. BLM must make a serious effort to eliminate domestic sheep in bighorn habitat (Page 2.40). DWR should be involved in negotiations and kept informed of possible conflicts and alternatives.

8-15 -- Increased vehicular access as outlined on Page 2.41 presents some potential negative impacts on wildlife. Many studies have shown that increased use by improving access causes many wildlife species to abandon the area. Species particularly sensitive to such disturbance include black bears, cougars, raptors, and bighorn sheep. We would suggest that access improvements concentrate on horse, foot, and bicycle trails. This could reduce impacts to wildlife.

8-16 -- In addition to the road restrictions placed on OHV on Page 2.50, seasonal restrictions outlined for wildlife should be applied to OHVs in areas critical to wildlife such as leks, nesting areas, wintering areas, and fawning and calving areas.

8-17 -- DWR should be consulted during analysis of cases involving the harvest of ponderosa pine, aspen, cottonwood, and other large conifers as outlined on Page 2.62.

8-12 We would not be allowing activities that would displace big game into poor quality habitat. The sentence describes the use of mitigation, such as acquisition of private land for wildlife or vegetative treatment, to reduce impacts to big game.

8-13 We have not seen any justification for seasonal restrictions of grazing around sage grouse leks nor has UDWR presented any evidence of that need. We have adopted the 2 mile buffer within sagebrush vegetation types, as stated in the Western States Sage Grouse guidelines, to protect sage grouse nesting habitat.

8-14 As stated in Table 2-15, we would continue to convert domestic sheep permits to cattle use, as the opportunity arises, and prevent the change back to domestic sheep.

8-15 Please notice that on Table 2-15 different types of access are proposed. It is our intent to acquire access through private lands to presently inaccessible public lands as opportunities arise.

8-16 OHV use will be limited either seasonally or yearlong to protect sage grouse leks, nesting areas and wintering deer and elk areas in the proposed plan. Please refer to Table 2-15 and Map Packet #10.

8-17 The resource area wildlife biologist will be consulted during preparation of any wood sale for ponderosa pine, aspen, cottonwood, or other large conifers. Should it be necessary for the UDWR to be consulted, coordination will be made at that time.

8-18 -- Regardless of which alternative is chosen, guidelines for seasonal restrictions and buffer zones for the protection of important wildlife species should be followed. These restrictions would apply if the species is present in the area. Clarification of these guidelines follows:

Seasonal Restrictions -

Mule Deer-	12/1 - 4/15 and 5/15 - 7/5
Elk-	12/1 - 4/15 and 5/15 - 7/5
Antelope-	5/1 - 6/30
Goshawks-	4/1 - 7/20
Ferruginous Hawks-	4/10 - 6/15
Golden Eagles-	2/1 - 7/15
Peregrines-	2/1 - 8/31
Prairie Falcons-	4/1 - 7/15
Sage Grouse-	3/15 - 6/30

Buffer Zones -

Peregrines-	1 mile
Bald Eagles-	1 mile
Other Raptors-	0.5 mile
Bighorn Sheep-	0.5 mile from canyon rims and talus slopes

8-19 -- There are several statements to the effect that restrictions can be waived following site specific analysis which receive a "no effect" or "no practical alternative" result. DWR would like to be involved with and informed of such analyses in order to determine the effects on wildlife before restrictions are waived.

8-20 -- The following species are listed as sensitive by the state of Utah and potentially occur in the DMRA. Actions which could potentially have negative effects on these species must either be reconsidered, steps taken to minimize impacts, or mitigated for losses. These species include:

- Dwarf Shrew
- Red Bat
- Spotted Bat
- Purple Martin
- Utah Milk Snake

8-18 UDWR was consulted prior to and during the formulation of this document. The guidelines chosen in the proposed plan are the same or more restrictive for all but three of the important wildlife species UDWR mentioned. Mule deer and elk are seasonally protected in the winter from December 1 through April 30. Crucial summer elk and deer habitat have not been identified as we believe it is not necessary to impose a summer seasonal protection restriction at this time. The proposed buffer zone for bald eagle is 1/2 mile. We currently do not have any nests identified within DMRA and we believe the buffer is sufficient to protect any potential nesting habitat at this time.

8-19 We will continue to inform and consult with UDWR in such instances.

8-20 Thanks you. These species have been added to the discussion of special status animal species under Fish and Wildlife Habitat Management in Chapter 3.

We appreciate the opportunity to comment on this document. We would like to review and comment on the final Resource Management Plan and Environmental Impact Statement. If there are any questions regarding our comments, please contact Ken Phippen, Regional Habitat Manager (637-3310).

Sincerely,

Ken Phippen
For

Miles Moretti
Regional Supervisor

SR/ksr
Copy: Catherine Quinn, DWR
Clay Perschon, DWR
Steve Madsen, BLM

Bureau of Land Management
170 South 500 East
Vernal, Utah
Dear Sirs

I do not understand what your Plan is but I am against any cut in number of Livestock number on the Federal range or any increase in number of wild life on the Public Lands as Elk and antlopes are too hard on the range lands in winter as they paw the brouse and kill it. As the Elk and Antelope are not having any young they must have bangs ~~too~~ which would get into the Livestock and put the Livestock people out business.

9-1

Frank W. Myers.

RESPONSE TO COMMENT LETTER 9 (MYERS)

9-1 There are no proposed reductions in livestock preference in the Clay Basin grazing allotment under the proposed plan. Current and objective AUM levels noted in Appendix A2-1 were derived from UDWR herd unit estimates and broken out by grazing allotment by BLM. Objective levels would be achieved only if monitoring indicated adequate forage was available and the vegetation was not being harmed. The proposed plan and 3 of the 4 alternatives would maintain the current preference level at 50,299 AUMs. The proposed plan would allow a 14 percent increase in forage allocation to wildlife (from 35,000 to 40,000 AUMs). Alternative B would allow a 31 percent increase and Alternatives C and D would allow a 7 percent decrease in wildlife forage allocations. The proposed plan takes into account the AUMs required to meet wildlife herd objectives that were not addressed in the current management. We are not aware of BANGS in the big game herds within the resource area. Such a concern would be more properly addressed to UDWR who has the responsibility for managing wildlife populations.

Subject: LAND CLOSURE BILL

To: David Little

From: Paul Shaffer District Sales Mgr. American Honda Motor Co.

10-1 This letter is concerning the Diamond Mountain Resource plan. We are deeply concerned that you have included restrictions on the Red Mountain area in your management plan. We hope you can reconsider the restrictions on the Red Mt. resource area.

Sincerely,

Paul Shaffer

Paul Shaffer-DSM

(801) 942-1783

RESPONSE TO COMMENT LETTER 10 (SHAFFER)

10-1 Based on the large number of public comments received dealing with management of the Red Mountain area, the decisions affecting this area have been reconsidered. Please refer to Chapter 2 summary of the proposed plan and Table 2-15 for the proposed plans for the Red Mountain-Dry Fork ACEC Complex. In a change from the draft RMP's preferred alternative, OHV use in the Red Mountain potential recreation area (approximately 1,240 acres on the east side of Red Mountain) would be limited to designated roads and trails yearlong. However, an area near the Taylor Mountain-Spring Creek roads (on the west side of Red Mountain) would be open to OHV use on designated roads and trails one month earlier than the surrounding area (opening March 1 instead of April 1). Also refer to Map Packet #10 for a graphic depiction of these areas and Table 2-5 for a breakdown of OHV use designation by acreage. We recognize the popularity of this area to OHV users, mountain bike users, horseback riders and hikers. As stated in the proposed plan, both a coordinated activity plan and a recreation plan would be prepared to identify in detail how the area will be managed. Some give and take will be required by all parties involved to accommodate the needs of others. Any plan must include the cooperation of, and be sensitive to, the desires of private landowners in the area.

295 Crossbow
Green River, Wy 82935
February 18,1992

Mr. David Little
District Manager
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Mr. Little:

11-1 I would like to make some comments about the Diamond Mountain Resource Area Resource Management Plan. The Browns Park area is very rich with history that needs to be preserved. John Jarvie Historical Site is a good start but much more is needed. The Indian story needs to be told. General William Ashley's 1825 visit, Fort Davy Crockett, the Rock Saloon, John Jarvie's ferry, Jenny Jayne's school, Dr. Parson's Smelters, William Manley's boat, all need to be replicated.

All of these things are important to the history of the west and should be preserved. If each site is restored at it's exact location, vandalism would soon destroy everything.(4.2) I propose we build replicas of all of this between John Jarvie Historical site and Indian Crossing Campground. This has been done at many sites in the west especially old mining towns. It would include the Jarvie ferry where it used to be, west of Jarvie the Rock Saloon, Jenny Jayne's School, Fort Davy Crockett, Fremont Indian Village, and possibly a prehistoric Indian Village. Someone is always at the BLM residence at John Jarvie and could watch over the whole area. We could have a Historical Lane-Where the Past meets the Present. The exact locations of the above sites could be shown on a map and also from a high point in Brown Park railroad ties with pipes for sighting through could point out the real sites.

Indians have lived in Browns Park for 12,500 years. The native peoples have occupied this region continuously since that time. (3.50) From page 3.3 These areas have large, complex sites which are in good condition. They contain considerable information concerning how prehistoric peoples lived and interacted with other populations in the region." In order to build a pipeline across federal land any indication of these prehistoric people along the pipeline had to be excavated at a great cost to the companies building the pipeline. This cost is eventually paid when taxpayers purchase what is in the pipeline. Usually the artifacts found are deposited in some university basement. If the government is going to make companies do this digging and taxpayers are going to pay for it in the end, let the public see the results. The recent pipeline across Browns Park found nearly forty sites and cost Questar $222,669. The artifacts should be brought back to Browns Park for everyone to see and divided into the proper ages. Eventually all eras would be represented as shown on page 3.3. (Paleo-indian (10,850-5050 BC), Archaic (6050 BC-AD 600), Formative or Fremont (300 BC-AD 1550), and Historic (1750 AD-present). Later I will give my thoughts as to where they should be exhibited. There are excellent Fremont dioramas at the Green River, Wyoming Museum and at Fort Caspar Museum that could be replicated. The Fremont State Park on I-70 has excellent exhibits.

General William Ashley, after completing the first rendezvous a few miles north west of Browns Park, floated down the Green River in a Bull

RESPONSE TO COMMENT LETTER 11 (CRANE)

11-1 We agree Browns Park's history needs to be preserved and interpreted. It is in the proposed plan to continue development and interpretation of the Jarvie Historic Site, excavate and interpret the Old Rock Saloon and develop a self-guided tour of the important historic features and properties in the Browns Park area. In addition other properties on public lands having important historical significance will be preserved and protected.

Boat and met Etienne Provot in Browns Park near Bridgeport on May 6, 1825. Ashley spent two days camped there. Provot had a large number of horses and a lot of provisions. Provot and six of his men had been trapping beaver in Browns Park. (Did he build the Stone Saloon?) During the fur trapping era Browns Park was the biggest city in the mountains, filled with 5,000 wild men, trappers, traders, packers and Indians." At the center of this city was Fort Davy Crockett. Fort Crockett was on the Safe Southern Route to Oregon. The Indians on this route were considered much friendlier than through Fort Laramie. One group of travellers reported meeting 10 different parties on their way to Fort Crockett. We have some very good desciptions as to what Fort Davy Crockett looked like. Three buildings were in a U shape with no fence around them. We do not know it's exact location. One author gives six possible locations with one at Bridgeport and one west of Jarvie. On one of the official maps of Utah historical sites it appears to be located near Jarvie. No one else wants Fort Crockett. It is so important to the history of the area it needs to be placed somewhere and the six possible locations shown. It slept 300 people. Most forts of this era were made with logs and 24' X 48' divided in the middle with a petition and fireplaces in each end. One of these buildings could be set up the way it was in 1836 for fur trading, one building for a museum with the Indian artifacts dug up by the pipelines and a place to show videos, and the last building a modern store run by a nonprofit group with the proceeds going to the upkeep and the construcation of Brown's Park Historic Lane.

Next in history was the Texas trail herds that wintered in Browns Park on their way to the California gold fields. Texans found Brown's Park had a mild winter and deep grass to break their two year cattle drive to the '49 Gold Rush in California. By this time there were already settlers in Brown's Park. 20 to 30,000 head of Texas cattle wintered in Browns Park for about five years.

William Manley and his party floated down the Green in 1849, and had to build a new raft near Jarvie. They had been driving wagons to California, but when they got to the Green River they found an abandoned ferry. They got on the ferry and headed for California.

Powell floated down the Green in 1869 and 71. When Powell floated down the Green River there were at least 10 settlers in Browns Park at the time. On his second trip on June 8, 1871, he had his mail forwarded to Browns Park. (Possibly the Rock Saloon.)

The "Rock House" could be the oldest or second oldest building in Utah. Minnie Rasmussen went there once on a picnic when she was a little girl. She said it had no windows, only slits under the low roof. This feature would seem to suggest a fort, perhaps of Spanish origin. Stanley Crouse reported that the unhewn logs forming its upper part had been marked as if they'd been taken from some earlier building and put up again on a cobblestone foundation. It has been described as, "Stood two or three log cabins and an old rock house. There were no windows in the rock building. It had slits in the rocks about six inches wide and three feet in length, just the right size for a couple of rifle barrels to fit through. Though the folks around called it the old saloon, it had apparently once served as a military outpost. The A. D. Farron Survey of 1878 clearly shows the location of the ruins of the "Rock House" just below (east) of Red Creek, on the left bank of the Green River. Jesse Ewing killed Charlie Roberts at the Rock Saloon and he is buried there. Pablo Herrera is reported to have spent a lot of time at the Rock Saloon.

Jenny Jaynes taught her children and the Parson kids in the first school (dugout) in Browns Park.

Dr. Parson's smelters were located near Bridgeport. He had two smelters. He must have been smeltering Jessie Ewing's ore for him. He must have had quite a business. A person would not build two smelters if he did not have a need for the second one.

The thing that made Jarvie popular was his ferry. After the Union Pacific Railroad was completed in 1869, north-south trade routes were established to bring raw products to the railroad and supplies and mail delivered to the settlers. Vernal's mail, supplies, and stage coaches came over this route for many years. Jarvie's Ferry supplied a very necessary service. Getting the supplies across a wide Green River that was often running to deep to ford. The ferry caused Jarvie's to be the Hub of Brown's Park. Regular stage and freight lines ran through Brown's Park by 1880. All north south traffic had to cross his ferry for over 25 years. The ferry needs to be restored.

BROWN PARK'S HISTORY LANE-WHERE THE PAST MEETS THE PRESENT

Brown's Park History lane would be located between the John Jarvie Historical site and the Indian Crossing Campground to the west of Jarvie. It would include (east to west) John Jarvie Historical site with Jarvie ferry replica, Rock Saloon, Fort Davy Crockett, a replica of Jenny Jaynes' dugout school, a replica of Dr. Parson's smelters, and a replica of a Fremont Indian village. In the museun at Fort Davy Crockett, could be such things as a replicas of Ashley's bull boat, William Manley's raft he made when his ferry wrecked at Red Creek, and all the prehistoric artifacts found by the pipeline.

The Taylor Flat Bridge is still laying in the field at Dr. Parsons. If we took the big timbers (8" X 24") from this bridge that are about thirty feet long, we could make a nice ferry. With four or five of these timbers we could make the boat part. Have a timber on each side of the ferry and cut a bevel on front and back and use sections of a timber for the ends and one in the center of the ferry. To this boat nail a 2" floor. The railings could be either 2 X 4 or lodgepole. The ferry should be about 12 feet wide and forty feet long. A wagon is about 18 feet long and two sets of horses would be another twenty feet.

Many old photographs could be shown in the museum that have never been on display in the area. There is a fantastic collection available at the University of Utah Library, UP & L Special Collection, Photographic Section, under the supervision of Roy Webb.

There is a great interest by a group of people to restore the above features. About all that is needed from the BLM is approval to build the things, for them to OK the construction plans, and to get approval from the state of Utah.

We do not even need to "dig" anything first as none of it would be on the exact location. The cost would be minimum but labaor intensive. The floors of Fort Davy Crockett would be rammed earth, the logs could be cut locally. By 1995 all of the above could be completed. The profit from the store at Fort Davy Crockett could pay for the upkeep.

Since there is a growing interest in Mountain Bike riding, bike trails could be established to each of the real sites and other important geological and historical features.

Thank you for this opportunity to comment about the plan.

Sincerely,

Allen Crane

Allen Crane

February 21, 1992

Jean Sinclear
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Dear Jean,

12-1 As a member of the Grant L. Hacking Family Partnership who have ownership of Bear Hollow and Mame Hole in Jackson Draw, Diamond Mountain, I would like to comment on the Diamond Mountain Resource Area and Environmental Impact Statement which is being considered at this time. I have great interest in your plans because I have had a lifetime of experience in this beautiful area. After studying your plans for the Bear Hollow and Mame Hole area it appears to me that you are using a great deal of our property in order to gain access to your BLM land. If you follow through with this construction you will be destroying some of the best pasture land on Diamond Mt. Our cattle business will suffer because of this.

12-2 Our land is suffering from the overgrazing of wildlife. If you build the purposed road you will be eliminating much needed pasture land. Add to that unscrupulous hunters who do not care for private ownership of land and livestock who would have access to our property as well as BLM, then we are in trouble. I am extremely opposed to the changes you are considering. I feel they are not in our best interest. Don't spend the tax payers money on something that is not needed and not wanted.

I hope you will reconsider your plans for the Mame Hole-Bear Hollow property and realize that no change is the best plan.

Sincerely,

Marilyn Beesley

Marilyn Beesley

RESPONSE TO COMMENT LETTER 12 (BEESLEY)

12-1 Thank you for expressing your concerns. However for clarification, the draft RMP outlined and analyzed general areas where access to public lands is needed. In several alternatives, the specific type of access was identified. Any rights-of-way obtained by BLM would be on a willing giver or seller basis. BLM has no intention of acquiring access through condemnation proceedings, nor build any access through sensitive areas. If public lands are open to the public, we believe these lands should be available to all on an equal basis.

12-2 As stated in Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives, under Fish and Wildlife Habitat Management, the management of wildlife habitat on public lands is the responsibility of BLM. Management of fish and wildlife populations are the responsibility of UDWR. We believe your concerns regarding increasing big game numbers should be addressed to UDWR. We will continue to coordinate closely with the adjoining landowners to minimize the adverse effects of big game on their lands.

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

Dear Ms. Smalley:

13-1 I am concerned that the Draft Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement does not adequately address the needs of motorized recreation and access.

The restrictions placed on OHV use in Alternatives B and E are unfounde and unreasonable and are unresponsive to the needs of a great many of your constituents.

I am especially concerned about the virtual closure of the very popular Red Mountain area as is proposed by both of these alternatives.

I would thus ask that Alternative A be adopted together with a heightened awareness of the legitimate needs of the very large number of motorized recreationists who visit this resource area.

Thank you,

Larry Holm 2·24·92

RESPONSE TO COMMENT LETTER 13 (HOLM)

13-1 Thank you for your comment. We have no intention of closing the Red Mountain area to OHV use in the proposed plan. Much of the area will be available to OHV users; however, some limitation are proposed that would affect OHV users (refer to our response 10-1). The relict vegetation area, crucial deer and elk wintering areas; as well as conflicts between various recreation user groups, and interests of adjoining landowners are all important issues that will need to be addressed in detail. A coordinated activity plan for the ACEC and, as needed, resource-specific plans will be developed to identify these details in managing the Red Mountain-Dry Fork area. It is reasonable to expect most uses would be affected to some extent by the specific management goals and objectives set out in these plans. All these plans must include the cooperation of and be sensitive to the desires of all affected groups.

Wild &Scenic Rivers

Dear Sirs

After reading through your study of the Dimond Mountian Resource Area
I don't feel that any of your alternatives A B C D or E are satisfactory.
with me . First of all if this or any of your alternatives are passed
30-1 this will have a impact on my Home on taylor Flats . First there will
be Know Road improvments on any road that are in site of the River
witch would take in the aproach road to the Taylor Flat bridge the road
exiting Jessy Ewing canyon paraleling the river. Your study says that
½ mi. or line of site , Now depending on where you are standing this
could take in my Home on taylor Flates and the Allen Ranch also
Willow Creek Ranch the State Fish & Wildlife. Therefore I am aginst
any of your alternatives and would like to protest aginst them. Another
reason I don't like any of your alternatives is because Ifeel that this
30-2 is just a foot in the door, Ifeel the goverment has enough control over
every thing we do .After seeing what happens to proptery that the state
of Goverment takes over I am aginst any more incroachment on private land
The only place you can find game now is on private Ranches, In our meet-
30-3 ing in Manila you people said that there would be know land take over
but that is not what it says in the study that you put out . I am
formally protesting this Wild & Scenic Rivers Act, or any of your alternitives
The Daggett Co. Comm. & my congressmen Will be hearing from me.

Rodell L Eggett
Browns Park

RESPONSE TO COMMENT LETTER 30 (EGGETT)

30-1 Management of the river corridor through Browns Park to protect potential wild and scenic river values would not affect private land. Landowners would still be able to use their property as they choose. Improvements could still be made to existing county roads.

30-2 We are not proposing to acquire private lands to protect wild and scenic river values. However, the proposed plan would allow for the acquisition of available private lands in level 1, 2 and 3 areas, including the opportunity to acquire private land along the Green River. As with acquiring public access, any private land obtained by BLM would be on a willing giver or seller basis.

30-3 Please refer to our response 30-2 above.

February 28, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley:

31-1 I have completed a review of the draft Diamond Mountain RMP and would like to offer congratulations on an excellent document. I fully support preferred alterative E. This alternative offers a good mix of present public land administration as well as a realistic look at the direction the BLM is headed in the future. As a long time user of the public lands on Diamond Mountain, I especially support the initiative to acquire legal access to public lands in the Lambson Draw, Jackson Draw, Warren Draw, and other areas where public access is not present. These public lands have been denied to the public for too long by a few private land owners that happen to own the bottom land crossed by county roads. Both the Congress and the general public are demanding more access to our public lands and the access initiatives in this plan are right on target. I sincerely hope that if this alternative is adopted, that an aggressive easement acquisition/exchange program be implemented as soon as possible.

Jim Paugh

RESPONSE TO COMMENT LETTER 31 (PAUGH)

31-1 Thank you for your comments.

DAGGETT COUNTY COMMISSION

Manila, Utah 84046

Phone: 801-784-3154

February 28, 1992

U. S. Department of the Interior
Bureau of Land Management
James M. Parker, Utah State Director
P.O. Box 45155
Salt Lake City, Utah 84145-0155

Re: Diamond Mountain Resource Area RMP/EIS Draft, Especially the Plans to Manage for or Seek Designation of Green River as a Wild and/or Scenic River

Dear Mr. Parker:

36-1 The Daggett County Commission has been approached by local residents concerning the designation of the Green River in Daggett County to "wild and/or scenic". We feel at this time there are too many "unknowns" as to the long term effect the designations may have, therefore, until further study and more answers are available, we oppose either or both designations.

36-2 There have also been concerns from residents of Daggett County supported by the County Commission which have grave reservations that the Diamond Mountain Resource Area RMP/EIS Draft does not reflect input from public meetings and/or written memorandum presented to you. We believe all agencies creating tourism and points of interest have an obligation to also address the transportation needs to accommodate these facilities, therefore, the Daggett County Commission opposes the draft as written.

36-3 The commission believes there should be a common goal for the betterment of Daggett County between all agencies. We also believe we cannot continue to attract growth and visitors to the area without considering adequate transportation needs.

RESPONSE TO COMMENT LETTER 36 (DAGGETT COUNTY COMMISSION, Steinaker)

36-1 Appendix 7 in the document has been changed to document Daggett county's opposition to designating the Green River as a wild and scenic river.

36-2 We believe every reasonable effort has been made to involve residents of Daggett County in the preparation of this plan. Concerns, suggestions, etc., received by the residents have been incorporated into the draft RMP for review and analysis. At the onset of the RMP process, several public scoping meetings were held to identify issues and discuss the then-upcoming plan. A scoping meeting was held on November 1, 1988, in Manila. Six (6) people from Daggett County were in attendance, including 3 members of the county commission. It was stressed at this meeting (and at every opportunity) that at any time the public was encouraged to contact the BLM to express their concerns and/or offer suggestions. In September, 1989, planning issues and criteria, developed after input from the public scoping meetings, were mailed. Comments on these planning issues and criteria were accepted through November 30. In September 1990, members of the Daggett County Commission were invited to attend a two-day briefing and tour for the Governor's Resource Development Conservation Committee to familiarize them with the issues and scope of the RMP. An update report was mailed to all interested individuals and organizations in January 1991. This report briefly outlined the alternatives under consideration. Again residents and county commissioners of Daggett County were provided information and the opportunity to respond. The draft document was released for public review and comment in January 1992. An open house on the draft RMP was held on January 30, 1992, in Manila to assist Daggett resident in their review of the draft document. Thirteen (13) residents signed the visitor's roster. We believe the residents of Daggett County were afforded ample opportunity to participate in the development of the draft RMP document. Their written comments to the draft are published in this document along with our responses. Concerns expressed in their comment letters were seriously considered by the team and suggestions and/or clarifications incorporated into the final document.

36-3 We are aware of the county's concern for adequate transportation as summarized in your letter to BLM State Director Parker, dated February 28. We believe your concern was adequately addressed in Mr. Parker's reply of March 23; we quote from Mr. Parker's letter:

...Our planning criteria for the RMP therefore states that 'transportation corridors will not be addressed in this Plan' (see page 1.11 of the draft RMP. These planning

36-4 Inasmuch as there appears to have been a lack of serious coordination or information exchange between BLM and the policy and decision makers of Daggett County, as reflected in the EIS draft, we hereby request an extension of time for comment on the draft EIS. Heretofore, we have not been given adequate input to the NEPA process.

We appreciate your interest and input in the growth and development of Daggett County. Therefore, Daggett County formally requests that your office closely coordinate with us any information, intended actions, etc. affecting our county.

Sincerely,

DAGGETT COUNTY COMMISSION

Elbert J. Steinaker Jr.
Chairman

Dick Bennett
Dick Bennett

James M. Briggs
James M. Briggs

cc:
Senator E. J. Jake Garn
Senator Orrin Hatch
Congressman William Orton
David E. Little
Ron Trogstad
Penelope Smalley
Daggett County Engineers/Uintah County Engr. Inc.
File

criteria were distributed in draft form for public review (including review by the three involved County Commissions) and were formally published in the Federal Register. They now provide the guidance to the planning team as they put together the RMP. To revise the criteria now would mean we would have to go back and redo much of the process which has already been completed.

Even though the Browns Park highway or transportation corridors were not addressed in the RMP, there is nothing in the draft RMP that precludes future consideration of the Browns Park highway or any other highway.

Because of the nature of the RMP, we could not address all of the site-specific issues that would need to be analyzed before we could approve any needed rights-of-way for a highway. This means there would still have to be a site-specific environmental assessment (EA) or environmental impact statement (EIS) before such approval could be granted. Therefore, I believe it would be in your best interest, as well as the Bureau's, to proceed with the RMP process now in progress. When the county is ready to proceed with the Browns Park highway by filing an application with the Bureau, we could then do one EA or EIS document tiered to the RMP that addresses all of the site-specific issues and impacts of the highway. This approach would be much less complicated and I believe that would allow us to respond to the county's needs in a quieter and more cost-effective manner....

36-4 We again quote State Director Parker's March 23 letter, which states:

...I believe that the Vernal District has made a good-faith attempt to include you in the development of the document, including several meeting held in Manila over the past several years, as well as telephone contacts. A 90-day period for review has been provided, which is the standard time allowed for review of the draft RMPs. I see no need at this time, therefore, to extend the public comment period unless there are other major concerns not associated with the highway....

United States Department of Agriculture | Forest Service | Intermountain Region | 324 25th Street Ogden, UT 84401

Reply to: 1950

Date: MAR 10 1992

Ms. Penelope Smalley
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

Dear Ms. Smalley:

Ashley National Forest Supervisor Duane Tucker, along with his Staff and Resource Specialists have reviewed your Draft Environmental Impact Statement for the Diamond Mountain Resource Management Plan.

Several of the Ashley National Forest's Resource Specialists have met or will be meeting with the Vernal District Staff to informally discuss some minor concerns regarding the need to coordinate management strategies for certain resources which overlap BLM and National Forest boundaries.

45-1 The Draft EIS appears to be thorough and well-prepared; we have no specific comments regarding the preferred alternative as it relates to the management of the Ashley National Forest.

Sincerely,

for GRAY F. REYNOLDS
Regional Forester

RESPONSE TO COMMENT LETTER 45 (US Forest Service, Reynolds)

45-1 Thank you for your comment.

March 5,1992

Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear BLM:

I have had the opportunity to review your Diamond Mountain Resource Study. I was impressed with the amount of work and information provided. It is an impressive work.

I have a few observations:

46-1 In your comments on the phosphate deposit - you wrote that the ore was high grade. Actually the ore is considered low grade and it requires expensive concentration by flotation to make an acceptable grade for users. As far as I know, this is the lowest grade phosphate mining operation in the west. I have worked in the Idaho phosphate field and the mined grade there averages 26%. At Vernal the grade is more around 20%. However, the thing that is unique about the Vernal deposit is its size and uniformity. There are probably 2 billion tons of phosphate rock stretching across the slope from Ashley Creek to Diamond Mountain. Vernal should be a center for phosphate mining for the next 100 years or more.

46-2 After considering the alternative proposals presented, I favor leaving the management plan like it is. I believe the multiple use concept has served the west and its people well.

46-3 Being a hunter and fisherman,I favor being able to have access to hunting and fishing areas without being restricted. I make my living by working in a mine. Its provided me the opportunity to work in a profession that's given me a good living. I'd like public lands kept

RESPONSE TO COMMENT LETTER 46 (ABPLANALP)

46-1 We qualified our assessment of phosphate grade by the use of the term "relatively", indicating that the grades in the Vernal Field were high enough to make them potentially attractive. However, you are correct in your assertion that the attractiveness of the deposit is governed more by its physical setting than by its grade alone.

46-2 The alternatives in the RMP respond to the public issues and management concerns developed during the scoping period conducted early in the planning process for this plan. All alternatives provide for multiple use of the public lands; however, different management combinations and emphasis are outlined consistent with the overall objective for that alternative. The alternatives provide an analysis of management opportunities and their different combinations in response to these issues and concerns. We believe the proposed plan is the best mix of management opportunities presented. The proposed plan provides for the public's use and development of resources while protecting or enhancing critical/important environmental values.

46-3 Mineral development can provide significant positive contributions to both individuals and the community. To the extent possible BLM will keep lands open for continued exploration and development.

46-3 Cont. available for the location and extraction of minerals. Mining has always provided some of the highest paying jobs.

46-4 I would like to see the Green River, between the Dam and Browns Park, utilized for the heavy recreational uses it provides. I would oppose the building of a road from Little Hole to Brown's Park,that has been talked about from time to time.

46-5 Your suggestion to keep Red Mountain as a primitive timber area appeals to me, but I would not want anyone who is using the area now to run cattle to loose their grazing permit.

46-6 I feel that we need to build consensus among the people living in the area before anything is done that will have a negative impact on their ability to make a living. I also have strong feelings that we, as land users, should respect the land. In the mining of the phosphate deposit we're careful to save the topsoil, re-contour the land and seed it with a variety of grasses and forbs beneficial to wildlife and cattle. I feel that with a genuine effort the land can be restored and left in better condition than it was before it was originally. Reclamation of land used needs to be a part of any land use plan.

Sincerely,
G.Howard Abplanalp
2587 N 1575 W
Vernal, Utah 84078

46-4 We intend to manage the Green River Corridor to maximize recreation use. It is expected that recreation use of the Green River will continue to increase over the life of the RMP. The proposed plan outlines recreation objectives for decisions to accommodate this increased use. Please refer to Table 2-15 under recreation, and Table 2-16 for recreation within the proposed Browns Park ACEC Complex. Regarding your concern about a Little Hole to Browns Park road, please refer to our response 36-3.

46-5 None of the grazing permittees in the Red Mountain Allotment under the proposed plan would lose their grazing permits. Adjustments in grazing can be made in the future based on rangeland monitoring conducted over time.

46-6 BLM is committed to proper management, including protection, use and restoration of public land. The RMP process allows for the public to provide input and review through the RMP development. True consensus may not be realistic; however, serious consideration of the various publics' issues and concerns is a "prime directive."

122 South Vernal Avenue
Vernal, UT 84078
March 10, 1992

David E. Little, District Manager
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Mr. Little;

We appreciated receiving the draft of the Diamond Mountain Area Resource Management Plan and we were glad to be able to discuss some aspects of the plan during the open house.

47-1 We can support alternative "E" with two reservations. The first, and most urgent, is that areas with a high potential for recreational use such as Red Mountain-Dry Fork, parts of Brown's Park, and Nine Mile Canyon, to name a few with which we are acquainted, should be given an official designation recognizing them as such. This might be an "area of critical concern", a "recreation district", a "recreation easement", or even a "recreation withdrawal". The reason we feel this way is that over time personnel and policy change, and this would make a stronger statement to future managers. The second is that we would like to think that all public land was being carefully managed. We realize that the designations represent levels of administration, but the term "agressive management" sounds like you are looking for someone to occupy the land.

Our decision is based almost entirely on the recommendations for recreational development since that is the use of public lands that most impacts us. Recreation on the public lands has not always been accorded a very high priority, the assumption being that it is not an economically beneficial use. As one of your alternative plans so plainly states, "recreation will be allowed if it does not interfere with other uses". We feel that the so called economic uses of the public lands do not concern as large a segment of the population as was the case formerly, even though we realize that those few who use the land are dependent on that use. Therefore, we feel that the users will have to make adjustments to accommodate this new reality.

47-2 This would include higher fees and costs which reflect the general increase of all costs, but also the increased value placed on the lands by the public which is, supposedly, the owners of these lands. We are concerned with the tendency of permittees to think they have a right to close roads and fence property as if they owned it. We think all users should understand that the public has the right of entry and that they, the operators, have the responsibility to protect their equipment and guard against any dangerous situations they have created.

We also believe that there are many kinds of recreational use and that some kinds are not necessarily superior to all others. We would expect that the managers make decisions as to appropriate use of different areas. Certainly not all marshes need a road, but not all motorized travel is bad - except, perhaps, to wilderness hikers. Rock climbing is fine, but must they climb every cliff? with more people, developed camp and picnic areas with sanitation facilities are needed just to protect the land from the people.

We do not believe that other uses are always detrimental to recreation either, but we would hope that in evaluating other uses the impact on recreational values would have equal consideration rather than being an afterthought.

RESPONSE TO COMMENT LETTER 47 (DEVED)

47-1 Browns Park, Nine Mile Canyon, and Red Mountain-Dry Fork have been recommended for designation as Areas of Critical Environmental Concern (ACECs) and Special Recreation Management Areas (SRMAs). These two designations would direct management attention to these areas, thus maintaining and enhancing the resource values of these areas.

47-2 It is BLM's policy to require public land users, including recreation users, to pay for the use of the land. We are continually working to improve access to public lands.

Finally, we are impressed with the size of the document and all the work that goes into preparing such a plan. How ironic, then, if all this time and money used to define and justify your actions should actually be to no avail. For, you see, no matter what you put on paper, the lands cannot be managed from the office. Everyone, miners, loggers, ranchers, hikers, campers, climbers, all with the most noble of motives, will take advantage of any situation that they perceive benefits them. Nothing will keep people on their best behavior like the knowledge that someone is checking up on them! The perception that nobody cares because no personnel are visible in the field leaves people free to waste and destroy without feeling any guilt. The only way to keep ranchers from over-grazing, loggers from over-cutting, miners from leaving a mess, jeepers and motor bikers from driving off trails, campers from dirtying the countryside is through the belief that official personnel might be there to see them do it.

All of the above is a matter of money - which no one has. "We could do it if we only had the funds". Maybe the best that can be hoped for would be a reassessment of the use of funds - more field work and less paper work?

Managed recreation is costly; the facilities must be built, then maintained, and the people managed. If this is not done the land suffers. As long as it is perceived that recreation does not generate any revenue it will probably not be taken too seriously when decisions are made. Remember, though, that congress has decided that uses of the public lands should be subsidized, no use pays the full costs. So why should recreation be regarded differently? Spokesmen for some groups suggest high user fees as a solution to over use; only the "truly dedicated", like themselves, would afford them. We feel this would be a disservice to the large majority of the people who are deserving of help to enjoy our public lands.

We thank you for this opportunity to express our thoughts on the subject.

Sincerely,

C. Lawrence DeVed

Rhoda T. DeVed

C. Lawrence DeVed
Rhoda T. DeVed

cc: Penelope Smalley

P.O. Box 100
Trinity Center, CA 96091
March 13, 1992

Jean Nitschke-Sinclear
Team Leader Diamond Mountain Resource Management Plan
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Dear Jean:

49-1 As a member of the Grant L. Hacking Partnership Family which owns 1380 acres of land in Jackson Draw that includes Mames Hole and Bear Hollow, I am concerned after reading the BLM Diamond Mountain Resource Management Plan. The Hacking's have owned this property for almost a century using it for sheep and livestock production. Improvements such as increasing the number of water reservoirs have made more water not only available to cattle but also to the increasing numbers of elk, deer, and moose as well as birds in the area. This area provides the means for this family to earn a living but has kept intact big beautiful Quaking Aspen Groves and Pristine Timber which seems to be rapidly disappearing due to disease, increasing wildlife, and most of all increased public assess which always brings increased trash, pollution, damage due to motorized off road vehicle tracks, exhaust fumes, paths, plant crush injury, and possible fecal contamination to the limited water supply even if facilities are provided.

I am opposed to any invasion of my family,s private property by the Bureau of Land Management. Existing livestock preference and private ownership should be maintained without new or increased numbers of wild and human life added.

Sincerely,

Marilyn K Scott

Marilyn Kim Scott

RESPONSE TO COMMENT LETTER 49 (SCOTT)

49-1 We appreciate your concerns. Please refer to our response 12-1.

United States Department of Agriculture

Soil Conservation Service

P.O. Box 11350
Salt Lake City, Utah 84147

March 12, 1992

Penelope Smalley
Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley:

Thank you for the opportunity to review the draft Resource Management Plan/Environmental Impact Statement (DEIS) for the Diamond Mountain Resource Area (DMRA). It is a very well done document. The informative maps and charts make it especially useful.

There are a few areas of the document that need clarification:

52-1 1. Page 1.2 "Description of the Resource Area," mentions land ownership patterns and management by other agencies within the resource area boundary. It mentions lands owned and managed by Ashley National Forest and Uintah and Ouray Indian Reservation, but the DEIS (except in Figure 1-1) makes no mention at all about the private and state lands that constitute a major percentage (34 percent) of the land within the DMRA boundary. Much of this land is intermingled (some in the same pastures) with BLM-administered lands and cannot be managed independently. What is done, or not done, on public lands will impact what can be done on private and state lands. Unless the opportunities for Coordinated Resource Management (CRM) are addressed in this EIS, it could hinder the potential for cooperative range/watershed management for these intermingled lands.

52-2 2. Under "Cumulative Impacts of Implementing Alternative E" (page 4.60) the DEIS states, "Cumulative increased wildlife use from 27,600 AUMs to 40,000 AUMs could result in livestock reduction (9,000 AUMs) . . . ." However, in Table 4-18, "Summary of Impacts," and elsewhere in the DEIS it states, "Livestock forage assignments would be held at current levels (50,200 AUMs)." It then states, "Preliminary monitoring data indicates a 1,300-AUM reduction in current livestock preference would be necessary under this alternative." The figures for AUMs seem to be inconsistent.

The Soil Conservation Service is an agency of the Department of Agriculture

RESPONSE TO COMMENT LETTER 52 (SOIL CONSERVATION SERVICE, Holt)

52-1 Land ownership and surface administration responsibilities are displayed on Figure 1-1. Figure 1-1 illustrates private and state acres within the Diamond Mountain Resource Area. The State of Utah and private lands have been added to Chapter 1 as major components of the ownership pattern within the resource area.

52-2 As stated in Chapter 4 for the proposed plan, under Impacts to Livestock Management from Vegetation Resources, it is expected that range improvements and improved management will provide sufficient AUMs to maintain livestock preference. Also any reductions in livestock preference would have to be supported by monitoring over time.

Penelope Smalley 2

52-3 3. Appendix 8, Title Page. Remove "for livestock" from the first heading under CONTENTS. This will make the heading read "Vegetation Inventory History and Ecological Condition." By definition, ecological condition is an ecological rating not a livestock forage rating.

52-4 4. Overlaying the Critical Watersheds Map on Page 3.58, the Sediment Yield Map on Page 3.61 and the Vegetation Zones Map on page 3.67 shows a significant extent of Pinyon-Juniper Woodland and Sagebrush Zones in critical watersheds yielding significant amounts of sediment. For these critical areas, a treatment method that alters surface hydrology by disrupting concentrated flow paths and leaving litter on the ground surface might be considered as a primary treatment method rather than burning. Such treatment methods would include cross-slope plowing with an off-set tandem disc or cross-slope chaining and leaving litter in place.

We hope that our range conservationists will have the opportunity of working with BLM personnel on Coordinated Resource Management Planning in this area.

Sincerely,

FRANCIS T. HOLT
State Conservationist

cc:
Karl Kler, Acting, District Conservationist, SCS, Roosevelt, UT
Patrick L. Shaver, Range Conservationist, SCS, SLC, UT
Mark M. Petersen, Project Planning Specialist, SCS, SLC, UT
Marilyn O'Dell, Project Planning Coordinator, SCS, SLC, UT

52-3 The statement "For livestock" was printed in error and has been omitted from the heading in Appendix 8 in this document.

52-4 Both burning and chaining in closed stands of pinyon-juniper and old age stands of sagebrush can provide long-term benefits for watershed. Burning has been chosen as the primary treatment method primarily due to project costs, and longer lasting effects. In areas where site specific environmental analysis shows an advantage, other forms of treatment will be considered.

P.O. Box 100
Trinity Center, Calif. 96091
March 10, 1992

Jean Vitschke-Sinclear
Team Leader Diamond Mt. Resource Management Plan
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Dear Jean:

Thank you very much for the copy of the Diamond Mountain Resource AreaResource Management Plan and Environmental Impact Statement sent to me by the BLM at the request of my parents Grant and Mildred Hacking.

Our Family owns 1,380 acres of land in Jackson Draw that includes Mames Hole and Bear Hollow. This area was first owned in 1907 by my Grandfather Joseph P. Hacking and then by my Father and Mother, Grant and Mildred Hacking and now by the Grant L. Hacking Partnership. Since 1907 this land has been carefully managed so it would be in top grazing quality condition to feed many sheep and cattle. The raising of sheep and cattle has been and still is the livelihood and financial support of my parents and many members of both Joseph and Grant Hacking's large Families. Children have been raised and educated from the financial profit of raising cattle on our private property. I am a member of the Grant L. Hacking Family Partnership and have a keen interest in our Family maintaining our family livestock business and the effect the BLM Resource Management Plan will have on this business.

My Father has been aware of the delicate eco-system of Jackson Draw and has made many improvements over the years that have benefitted not only his cattle but the wild mammal and bird life and the natural plant and tree life. Reservoirs have been built that have watered not only his cattle but the increasing wild life population. The beautiful pristine timber and quality quaking aspen in the top of the draws, namely Mames Hole and Bear Hollow that borders the BLM, have been well cared for and are essentially the same today as they were in 1907. Very few areas such as this exists today. This area can be viewed by the general public from the county road that already exists in the bottom of Jackson Draw. To disturb this present well balanced sensitive plant and animal eco-system would be disastrous.

The Hacking Family has worked hard to care for Jackson Draw! Please do Not develop a Bear Hollow Campsite as indicated on p. 3.45. This would not only take away some of our family's pastureland livelihood but would disturb the present prisitine fragile eco-system due to public road access. DO NOT develop a road through Mames Hole to reach the BLM Property at the top of the ridge as a big portion of our pastureland there would also be ruined and the eco-system invaded. Public access to the BLM ground through our property would ruin groves of unblemished quaking aspen and beautiful pine trees. Trees cut for wood, initials carved in their bark, off road motorized vehicle tracks, exhaust fume pollution, trampled plants, unwanted trash, decreased remote nesting and newborn wildlife areas, and possible fecal contamination to the fragile spring water sources as people do not

53-1

53-2

RESPONSE TO COMMENT LETTER 53 (SCOTT)

53-1 The Bear Hollow potential recreation site has been dropped from further planning consideration.

53-2 Thank you for expressing your concerns. Please refer to our response 12-1.

53-2 Cont. always use the toilets provided, are only a few of the problems that would be created by the public.

Allow the Hacking Family and the future generations of that family to continue their excellent management of their own private property along with the other private property owners in the area such as The McCoys and The Siddoways, without interference from the Bureau of Land Management. It seems the private property 53-3 owner who provides thetax base by which the BLM operates is almost an endangered species. HELP PROTECT THEM! We have done a great job over the years! Existing livestock preference and private ownership should be maintained without new or increasing numbers of wildlife or human life added to this beautiful sensitive area that has been well cared for through private ownership but yet visually accessable to the public.

I agree with the management theme general statement on p. 2.23 that reads....."This alternative will maximize forage production for livestock while maintaining/ennancing critical renewable resource systems and values within the resourse area. Under this alternative the intent is to ensure existing livestock preference is maintained and wildlife numbers remain at current levels."

Sincerely,

Eleanore Hacking Scott

Eleanore Hacking Scott

53-3. We share your concerns for proper habitat management. During the analysis process, data showed that wildlife forage allocation could increase, while maintaining livestock preference. Monitoring use levels and vegetation trend, over time, would be the key factor ensuring over use does not occur.

FOREST INDUSTRIES
1445 South 500 East
Vernal, Utah 84078
(801) 789-7001

March 9, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley:

I attended your "open house" workshop on January 24, 1992. Thank you for your time to visit regarding the various proposed alternatives and the effects/results of each alternative. Also, I want to express my thanks to allow me to voice my concerns and opinions.

54-1 After review of the Diamond Mountain Resource Area RMP/EIS Draft Document, I feel you have adequately analyzed the major resource uses/users of the region.

I feel all people should be included in the participation and utilization of activities on public lands. We should strive for a controlled "balance" to protect our lands, and at the same time, be able to conservatively mine our energy resources, graze our forage producing lands, and harvest our woodlands.

Based on my analysis and past experiences with the Bureau of Land Management, I concur with your preferred alternative---Alternative E.

Regards,

John E. Kornfeld
Owner/Manager

RESPONSE TO COMMENT LETTER 54 (Forest Industries, Kornfeld)

54-1 Thank you for your comment.

Dear Ms. Smalley:

I oppose the selected alternative for the Draft Diamond Mountain Resource Area Plan and its proposed closure of Red Mountain to off-road vehicles.

55-1 Red Mountain has had continuous use by horses, R.V.s bikes and snowmobiles, and the area still shows no adverse affects from recreational use. Such use should continue, and the management plan should be written to reflect this.

Alternative A should be adopted. The BLM must plan for the needs of off-road recreation.

Sincerely,

Wendy May
PO Box 75
Vernal, UT 84078

RESPONSE TO COMMENT LETTER 55 (MAY)

55-1 Please refer to our response 10-1.

March 18, 1997

Dear Ms. Smalley,

My family and I moved to Vernal one year ago. We are very impressed with the beautiful area but are appalled at the ongoing destruction of the land and the possibility of future destruction.

61-1 I would like to let you know that I support Alternative E of the Diamond Mountain Resource Management Plan and the proposed improvements by the Uintah Mountain Club. I would also like to see more lands in Level I and II. If there is a

61-2 possibility of any phosphate mining in the Red Mountain-Ashley Creek area, please put a stop to it. This is a magnificent area and it should be left alone. I also hope that the slickrock north of

61-3 Steinaker will be protected. It is a unique area and I feel lucky to live so close to it. I also want to mention my support for the protecting of Endangered Species in this area and for the re-

61-4 introduction of once-common indigenous species seeing a mountain side full of bighorn sheep in the Sheep Creek Canyon area is something I will never forget. Finally, I want you to know that I support

61-5 Wild and Scenic Status for the Upper and Lower Green River.

Perhaps since I came from a not so scenic State I really appreciate this area. The fact that the land and wildlife are threatened sickens me.

Sincerely,

Nancy Jochems

RESPONSE TO COMMENT LETTER 61 (JOCHEMS)

61-1 Please refer to the Summary section at the beginning of this document for an explanation of the management priority area concept and how resource values were assigned to a particular management level. The RMP team, using data gleaned from the public scoping meeting held at the onset of this project, determined the management priority area levels and the resource values applicable to each level for each alternative discussed in the document. We believe the assignment of resource values within DMRA to these levels provides for the public's use and development of resources while protecting or enhancing critical/important environmental values.

61-2 In the proposed plan, the Bureau-administered mineral estate area between Ashley Creek Gorge and Dry Fork Creek in the Red Mountain-Dry Fork ACEC would be closed to phosphate mining.

61-3 It is unclear what type of protection you seek. If you're referring to OHV use, please refer to our response 10-1.

61-4 Thank you for your support.

61-5 Thank you for your support.

Mr. Alvin C. Kay
P.O. Box 23
Vernal, Utah 84078

March 02, 1992

Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

ATTN: PENELOPE SMALLEY - TEAM LEADER

RE: DIAMOND MOUNTAIN RESOURCE MANAGEMENT PLAN

Dear Ms. Smalley;

After reviewing the Diamond Mountain Environment Draft Statement, I have come to the conclusion that it is the most stupid and asinine proposal that any Government Agency has ever made.

In 1970, I sold to the Utah Wildlife Resources about 2700 acres of land in the Warren Draw and retained 1200 acres for my children and grandchildren's use and enjoyment. I have built a number of ponds, and have fish planted in four of them for our own personal use.

Udell Gardner and myself have a small herd of cattle running on our fee ground and on the B.L.M. ground on each side of the draw. We pay an annual fee to the B.L.M. for the grazing rights.

The Utah Wildlife Resources have the South part of the draw (2700 acres) and encourage the public to use the area for hunting, camping, and picnicking. Now this seems to be enough ground for their use in this draw.

There are a number of reasons why I am opposed to your intentions to trespass across my ground:

62-1

1. There are three (3) summer cabins on the property, one of which is worth $100,000.00. Now my question is - what if these cabins are vandalized, who is responsible?

RESPONSE TO COMMENT LETTER 62 (KAY)

62-1 Please refer to our response 12-1. If BLM did acquire public access across private lands and vandalism damage or trespass occurred, the violators would be responsible for their own actions in accordance with state laws and local ordinances. Cattle guards and signs could be installed or a cooperative agreement could be obtained between BLM and the private landowners which outlined agreed upon responsibilities for all parties. If public lands are open to the public, these lands should be made available to all on an equal basis.

62-1
Cont.

2. We run cattle in this draw, and the cattle like to lay in the road, for the dust keeps the flies away. What if one of the public hot rodders hits one of these cows or calves, who is responsible?

3. If any of the public gets off the designated Right-of-Way, and trespasses on my private property, who is responsible?

4. You will undoubtedly have to install a cattle guard, and if a cow or calf gets in the cattle guard and has to be destroyed, who is responsible?

5. If the public fishes in my ponds, or uses my private picnic or restroom facilities, who is responsible?

6. I have six (6) children and twenty two (22) grandchildren and most of them hunt deer. Last year there were twenty one (21) of our family hunting deer and two (2) others that my grandchildren brought in, plus five (5) hunters camped at Rex Gardner's cabin for a total of twenty eight (28) people or about one behind every bush. This is probably the most hunters in any one area on the mountain, yet you want to open it to the general public. Does this make sense?

I am completely opposed to the B.L.M. wanting to open my property in the Warren Draw to the public and attendant problems.

Sincerely,

Alvin and Virginia Kay

AK-VK/tk
cc: Senator Jake Garn
Senator Orrin Hatch
Congressman Bill Orton

Lawrence C. Kay
1940 East 2500 South
Vernal, Utah 84078

March 19, 1992

Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Attn: Penelope Smalley
Team Leader

Re: Diamond Mountain Resource
Area - Resource Management
Plan and Environmental
Impact Statement.

Dear Ms. Smalley;

After spending a huge amount of time reviewing this Diamond Mountain Resource Area Draft Statement, it appears to be very complex and not understandable.

63-1 There should be a solution to make the statement easy to read and understandable. It appears that the statement is made cumbersome and awkward by the shear volume of material and is arranged in such a matter that it is extremely hard to understand.

My concern deals with the property that I and my family own in the Warren Draw on Diamond Mountain. As I studied the plan it became really hard to comprehend what the B.L.M. is proposing.

A short history of Warren Draw. It was patented late in the 1800's and used for cattle, sheep, and horse grazing. Approximately in 1970, Rex Gardner, Glenn Cooper, and Alvin Kay purchased the property which included all of the fee owned property in Warren Draw. They also acquired the Federal Grazing Permits, allowing for private animals to graze on the B.L.M. property that lies on the tops and sides of the North - South ridges on each side of the Draw and also on the North side of the Draw, and surrounds the fee owned areas. These permits require yearly payments to the B.L.M. for these uses.

RESPONSE TO COMMENT LETTER 63 (KAY)

63-1 We are sorry you found the draft document cumbersome and its format difficult to understand. The summary section immediately preceding the Table of Contents was intended to help the reader understand the document's format and assist in its review. Please be aware that the proposed plan/final EIS format closely follows the draft document. A summary section is provided in the beginning of volume I of the proposed plan/final EIS.

Some time after the purchase the owners (Kay, Gardner, and Cooper), sold the South 2/3rd's (2700 Acres) of the Draw to the State of Utah, Department of Wildlife Resources. The State was primarily interested in retainage of Wildlife Habitat and Winter Range for Elk and Deer. The State has kept the area open to all hunters and the public for whatever they would like to do. The public still has the right for foot traffic and hiking around the Fee property.

The North portion was retained by Gardner (240 Acres) and Kay (1210 Acres) and developed as a grazing property for horses and cattle. They have constructed nine (9) ponds that retain water for dispersement to the cows and horses during the grazing season. Also the bottom of the Draw was treated to kill some of the sage brush. Corrals were built, springs repaired and upgraded, and roads were upgraded, etc. There has been a large investment of time and money to bring these facilities on line.

Alvin Kay and his wife Virginia have shared their ownership with five (5) of their children and the Kay families take great delight in using the Draw during the Summer and Winter.

1. The Kay's have planted fish in four (4) of the ponds and continue to stock them for use of the grandchildren.

2. The Kay's have built a small park including a picnic table and grass area, outhouse and fireplace by the North pond for the families use.

3. The Kay's and their spouses and family members spend large amounts of time on their property hunting, fishing, relaxing, and enjoying the out of doors.

4. The Kay's have two (2) cabins on their property and Rex Gardner has an extremely nice cabin ($100,000 cabin) on his parcel for their families enjoyment.

The Warren Draw has become an excellent grazing area for the cows and horses because of the diligence and investment in land, water, brush removal, corrals, fences, gates and other livestock appurtenances completed.

Also involved in this area is a large herd of elk who use the same facilities with the cows and horses and a small number of deer. The elk and deer also use this area as a wintering ground.

63-2

We object to the B.L.M. Diamond Mountain Resource Area RMP & EIS Report on a number of important points such as:

1. **This property is fee owned and should never have an access road or roads through it because of the disruptive noise, movement, and harassment of livestock and game animals and all related problems with vehicular traffic.**

2. **Access into private property only causes other problems such as vandalism of cabins, grader, fences, corrals, livestock, vehicles and other items. (NOTE: Trucks, 4 Wheelers, Tractor, and Road Grader are left in the Warren Draw during most of the year).**

3. **Who will restock the fish ponds, cleanup debri left by the public, outhouse cleanup, and other problems caused by the public?**

4. **De-valuation of property due to a public access through the property which then requires additional fences to protect the livestock from vehicle traffic, and other related problems.**

5. **Big Game Management requires some safe areas away from the hunters. Public access always allows more people into a given area which in turn pushes the game animals into smaller and smaller areas.**

6. **Cattle guards should not be installed because of the extreme problems of horses and cows getting into the guards and breaking legs, etc.**

63-2 Thank you for expressing your concerns. Please refer to our response 12-1.

63-2 Cont. All of our family members are completely against public access into any areas on Diamond Mountain not already available to public traffic and especially in the Warren Draw.

Sincerely,

Lawrence C. Kay

LCK/jk
cc: Senator Orrin Hatch
Senator Jake Garn
Representative Bill Orton

March 19, 1992

Ms. Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley:

I'm writing concerning the Diamond Mountain Resource Area, and the five management plan alternatives presently being considered by the BLM. I STRONGLY SUPPORT ALTERNATIVE E.

As a member of the Uintah Mountain Club, I wholeheartedly support their proposed improvements for Alternative E.

Specifically, I would

67-1 - urge the BLM to include more lands in Level 1 and Level 2 management prescriptions.

67-2 - oppose phosphate mining in the Red Mountain-Ashley Creek area. I don't see how this would give a significant boost to the economy of the Uintah Basin, but I do believe it would significantly alter the scenic value of the area.

67-3 - urge greater protection for the slickrock area north of Steinaker Reservoir. This unique area deserves it.

We have recently moved to this area from Kansas, largely because of the wondous scenery and the recreational pursuits the Uintah Basin has to offer. We've already had many memorable experiences, and look forward to many more. Please continue your good work in preserving the priceless beauty that surrounds us.

Thank you for your consideration in this matter.

Most sincerely,

Gregory E. Jochems
4095 W. 500 North
Vernal, Utah 84078

RESPONSE TO COMMENT LETTER 67 (JOCHEMS)

67-1 Please refer to our response 61-1.

67-2 Please refer to our response 61-2.

67-3 Please refer to our response 61-3

March 13, 1992

Dear Jean,

I am the son of Joseph P. Hacking who owned Mame's Hole and Bear Hollow from about 1907 until he died in 1944. The ownership then passed to me in 1947.

He never overgrazed it but left some feed in the Fall to prevent overgrazing and misuse of the land. At that time there were deer but no elk. In 1935 they wanted to put 79 head of elk on all of Diamond Mountain. The number has now multiplied to thousands. In Mame's Hole and Bear Hollow in 1991 more than 500 head of elk have been seen. Now in 1992 the plan calls to triple the number of wildlife there.

68-1 Our concern is how the elk and deer can be fed and still leave enough forage for my cattle on my patented ground. This plan to increase the wildlife is drawn out in the management plan you have sent to us.

68-2 As far as the burning plans go I want to tell you of my Dad's experience with burning in Bear Hollow. He waited 2 years for the wind to be just right to burn sagebrush. The wind changed after the fire was started and it swept uncontrolled up the hillside. There is still evidence of this today. You have not said whether the 200 acre burn would be on BLM or my ground. If it is to burn on BLM ground you would destroy alot of beautiful forested hunting. I don't want my land to be burned off without my permission and advisement.

68-3 If you continue your plan to build a road into Mame's Hole, you will create many problems with my cattle which is my livelihood. It will cut down on my acreage, open up my land to foolish hunters(sportsmen) who can't always recognize a cow from an elk or deer. The livestock will mix up with our neighbors cattle.

It is about one mile from the main road to the BLM ground in Mame's Hole. That will cut out approximately 40 acres of my patented grazing land. We love the beauty and privacy of Mame s Hole and we would be distressed to find it full of uncaring people who make deep ruts across the grasslands.

We have leased the hunting rights to about 15 families who care and protect it. We want it to remain as it is. They have taken very good care of the land and have had very few problems since we leased these rights out.

68-4 Plans for a campground in Bear Hollow are no good for anyone. More roads into BLM ground will have to be built and then fenced which will take more of my acreage and open the area up to more people capable of doing damage to the environment. I fear for my cattle being killed or driven off, the fences cut down and the gates left open.

Although there were some improvements made before I owned the land, I have been involved with making a series of valuable ponds. Livestock and wildlife have benefitted from these. I built two reservoirs below the cabin and corral at the southend of my property, increased the size of the pond in Mame's Hole, built a good one near McCoy's fence, enlarged the one in Bear Hollow and plan to improve the one in Hadlock Cove this summer.

In the last 45 years, I have run cattle in Mame's Hole and

RESPONSE TO COMMENT LETTER 68 (HACKING)

68-1 During our analysis for the RMP, both livestock and wildlife forage needs were reviewed and compared to existing forage on an allotment basis for each alternative. Our analysis showed that livestock preference could be maintained while allowing wildlife forage allocations to increase. We will monitor this increased use with vegetation studies to insure overuse by wildlife does not occur. Analysis also showed range improvement work on public land could supply an additional 28 AUMs of forage in the Mame's Hole-Bear Hollow allotment, benefiting both livestock and wildlife. Also please refer to our response 12-2.

68-2 If burned, the 200 acres on BLM would be conducted under safe fire prescriptions as outlined in a site specific burn plan and environmental assessment prepared prior to any burning. Please refer to Chapter 2, Management Guidance Common to the Proposed Plan and Alternatives for details.

68-3 Thank you for expressing your concerns. Please refer to our response 12-1.

68-4 Again thank you for expressing your concerns. Please refer to our response 12-1.

Bear Hollow and have been very careful to not overgraze this excellent pasture land. Increasing the number of wildlife will take feed away from my cattle. It is a problem which no one seems to know how to control. I do not want you to blame any reduction in feed growth on my cattle when the wildlife will soon outnumber the cattle if your plans continue.

The money I receive from cattle is banked in Vernal banks, supplies are purchased from local merchants, taxes are paid in Uintah County. Money spent by local ranchers in this area far exceeds the revenue paid by sportsmen.

In all of the years that the Hacking Family have owned Jackson Draw inwhich Mame's Hole and Bear Hollow are a part of, we have tried and succeeded in not overgrazing and in improving all water resources to make it some of the finest pastureland on Diamond Mountain. BLM has not made any improvements on their portion.

Please DO NOT make any changes! Let us continue to take care of it and manage it as it is now.

Sincerely,

Grant L. Hacking

Grant L. Hacking

1745 N. 3500 W.
Vernal, Utah 84078
March 19, 1992

Jean Sinclear
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Dear Jean,

Recently we interviewed a member of your staff regarding the plans for development of the Mame's Hole-Bear Hollow area which are included in your book entitled "Diamond Mountain Resource Area, Resource Management Plan and Environmental Impact Statement.

Some of these plans are causing us great concern, particularly the one which would open up the Mame's Hole area by building a road across our Jackson Draw grazing land up into Mame's Hole and continuing on into Lambson Draw.

69-1 Joseph P. Hacking, Grant's father, purchased all of the land in Jackson Draw so he could provide pasture for his sheep. He negotiated with the BLM for use of their property.

Since Mame's Hole and Bear Hollow became Grant's, he has faithfully paid for the lease from the BLM.

Fences have been built, reservoirs constructed, crickets poisoned, and a careful consideration of non-grazing of his land and BLM land.

There was a time when hunters traveled any place they wanted to on this land. Deep ruts from vehicles driving off the designated roads resulted. Our cattle were always endangered. In fact, we brought our livestock off the mountain before the hunting season began to avoid the cattle from being shot by hunters. We have had trouble in the past with wire fences being cut, gate posts broken off, and cattle being killed.

For the past few years we have leased our private land which gives access to Mame's Hole and Bear Hollow and BLM ground to a group of families who care for it as if it were their own. They post it to keep the roads, water, and cattle safe. Through cooperation with these people, other people have hunted on both our ground and BLM ground without causing any damage.

Opening a road into Mame's Hole would be a tremendous undertaking considering the rocky, steep area it is in. Pressure from environmental groups to pursue this should be discouraged.

In the Deseret News recently there was an article about the problems facing a rancher in Tooele County. His cattle are being killed, fences cut, gate posts shot off, even cement blocks ruined by gunfire. BLM has posted many signs in Tooele County but these last only one day because of being shot at. We fear a similar situation will occur in Jackson Draw leading to Mame's Hole and Bear Hollow.

We should like to protest anymore consideration of such a road building plan.

69-2 We have been determined during our years in the farming and livestock business to sell locally and in turn to buy locally.

RESPONSE TO COMMENT LETTER 69 (HACKING)

69-1 We appreciate your concerns. Please refer to our response 12-1.

69-2 We recognize the importance of the agriculture industry to the local economy of the basin. Please refer to Chapter 3 and 4 for a discussion of the socioeconomics factors involved with this proposed plan.

Along with others involved in the same business, we know that we have helped the local economy every year.

69-2 Cont. Some people may think that catering to hunters will increase county profits. These sportsmen do not pay land taxes. They may buy a few days of groceries and housing but the stability of the economy rests with the stockmen and land owners. It seems too bad that we have to fight for our rights to own land and care for our livestock when we contribute so much.

69-3 We are concerned with the increasing number of wild life we are feeding. The elk herd is enormous now and the prospects of more on our land is staggering and will soon consume all of our grazing land leaving nothing for our cattle.

We appreciate your help and hope this will influence your decision to leave our area without any changes.

Sincerely,

Mildred B. Hacking

Mildred B. Hacking

69-3 Please refer to our response 12-2.

Clint McKnight
150 E. 4000 S.
Vernal, UT 84078

3/20/92

Penelope Smalley
Bureau of Land Management
170 S. 500 E.
Vernal, UT 84078

Dear Ms. Smalley,

I want to congratulate the BLM for what I understand are it's intentions to better protect the Diamond Mountain Resource Area. From what I have seen of the management alternatives being proposed, I want to express my support for Alternative E.

70-1 It is inevitable that greater responsibility for the protection of our public lands will become policy and I'm pleased to see your agency responding to that public sentiment. My only complaint is that Alternative E doesn't go far enough. The damage being done in the Diamond Mtn. area by OHV operators is almost criminal. Are you aware of the extent of the vandalism and landscape destruction that is going on? It is far better to err on the side of protection in this fragile environment.

70-2 I am also greatly pleased by your efforts at restoring the original wildlife species in the DMTRA. As part of this new respect for wildlife, please do all you can to abolish the

70-3 cruel practice of bear-baiting. I am astonished that this kind of thing is allowed to go on.

Sincerely,
Clint McKnight

RESPONSE TO COMMENT LETTER 70 (MCKNIGHT)

70-1 Thank you for expressing your concerns. Please refer to the narrative summary of decisions for the proposed plan affecting OHVs and Table 2-5, all in Chapter 2. We believe these proposed decisions adequately protect the important resource values while offering public lands for responsible OHV use.

70-2 Thank you for your support.

70-3 The rationale for not allowing bear baiting on public land is based on the potential public health hazard and conflicts between recreation users and bear-baiting sites which have not been cleaned up. Our responsibility is to manage and improve wildlife habitat not determine methods of hunting. The methods of hunting for each wildlife species is the responsibility of the Utah Division of Wildlife Resources.

William John Kremin, III
814 East 2970 South
Vernal, Utah 84078

March 3, 1992

Penelope Smalley
Bureau of Land Management
170 south 500 East
Vernal, Utah 84078

RE: Diamond Mountain Resource Managment Plan

Ms. Smalley,

73-1 I am concerned that some of your proposals for Diamond Mountain would adversly affect the Jackson Draw area. While most of the meadowland is privately owned, I have found that the owners are most co-operative if asked about access for hiking, horse riding, and even hunting. In a time when much effort is put into preserving areas, as much as is possible, in the natural state, I find it a quandry that opening up the area is proposed. While opposed to closing areas to most people by wildarnase designation, I also feel that a cautious approach must be taken when opening up lands that are prime habitat for Elk, Deer, Moose, Bear, and many small game as well.

Land access is now available with permission. An increase in vehicular traffic would just continue to erode the now dwindling wildlife habitat, and force much of that wildlife out of the area. Thanking you for your time and consideration of my thoughts.

William John Kremin, III

William John Kremin, III

RESPONSE TO COMMENT LETTER 73 (KREMIN)

73-1 We appreciate your concern. Please refer to our response 12-1.

UTAH CHAPTER SIERRA CLUB
177 EAST 900 SOUTH, SUITE #102
SALT LAKE CITY, UTAH 84111
(801) 363-9621

Uinta Group Chairs

Clyde F. Gillette	1962-1964
Glenn E. Cosey	1965
William Vieyont	1966
Fred Montmorency	1967-1968
June Vieyont	1969

Utah Chapter Chairs

June Vieyont	1969-1970
Paul Salsbury	1971-1972
Ruth A. Frost	1972-1974
Del Weiss	1975-1976
Jack McClellan	1977-1978
Paul Salsbury	1979
Brian B. Beard	1980-1981
Alan Miller	1982-1984
Jean Bryson	1984-1985
Gibbs M. Smith	1986-1990
Ed Blankmon	1991-

March 23, 1992

FOUNDED IN 1962 BY CITIZENS OF UTAH

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley:

The Utah Chapter Sierra Club supports Alternative B (Ecological Systems) as the alternative with the most environmentally sound minimum management guidelines for the Diamond Mountain Resource Area.

While we understand that Alternative E was selected because it provided the best "mix" of management objectives from the numerous perspectives of interested parties, we still believe that a predominantly ecological approach is necessary at this time. For many years, development and commercial endeavors have taken precedence over preservation and protection of natural resources. We believe that the management objectives in Alternative B are a good first step towards remedying the environmental abuses of the past. 74-1

We believe that some of the guidelines in Alternative B do not go far enough. We have found little evidence to support the continued use of vegetative treatments and range improvement projects to increase AUMs or change the vegetative components of particular areas. 74-2 We believe that a greater portion of the Resource Area should be closed to OHV use. 74-3 We recommend that a full EIS on the effects of oil and gas development in the Resource Area be completed prior to lease issuance under these proposed surface use guidelines. 74-4 We believe that mineral withdrawal and NSO stipulations should be implemented throughout ACECs to more adequately protect their resources. 74-5 Acquiring funds for monitoring programs to ensure compliance with all aspects of the RMP should be a high priority.

We urge you to reconsider your recommendation of Alternative E as the Preferred Alternative. We believe that Alternative B (or an even stronger ecosystem-oriented version) would provide the Resource Area with

printed on recycled paper

RESPONSE TO COMMENT LETTER 74 (UTAH CHAPTER SIERRA CLUB, Osborn)

74-1 Thank you for your comment.

74-2 Please refer to the vegetation resources section under "Management Common to the Proposed Plan and Alternatives" in Chapter 2, dealing with vegetation treatment methods. By reference we are including BLM's Vegetation Treatment EIS and Record of Decision (1991) in this document.

74-3 Lands in the resource area were designated "open", "limited", or "closed" to OHV use based on resource values needing protection. Lands were closed to OHV use only if resource specialists believed it was necessary to protect a specific resource value.

74-4 The RMP/EIS satisfies the NEPA requirements for issuing fluid mineral leases.

74-5 Approximately 40 percent of the lands within the proposed ACECs would be recommended for withdrawal or categorized as NSO; these correspond to the level 1 and 2 lands for these ACECs. The remaining lands within the ACECs would be managed in a manner so as not to adversely effect or compromise the important resource values that justified the ACEC designation.

the optimal management objectives and ensure the healthy perpetuation of its numerous natural resources.

Thank you for the opportunity to comment on the proposed RMP. We are pleased to see the inclusion of an ecosytem-intensive alternative, and again request that the BLM consider that as the Preferred Alternative. Please send me a copy of the Final RMP upon its completion.

Sincerely,

Christine Osborne

Christine Osborne
Public Lands Specialist
1536 East 3080 South
Salt Lake City, Utah 84106

116 Candlewyck Dr W
Tacoma WA 98467
March 17, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal UT 84078

Regarding: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production with limitations.

Dear Ms Smalley,

As part owner of the Mame's Hole-Bear Hollow area I am totally opposed to any development or burning in this area.

Having spent many hours and days in that beautiful mountain Jackson Draw I feel that the DMRA plans, especially in Alternative A and E, are not the best long term interest and use of that area of Diamond Mountain. The long term emphasis should be the production of food and forage. There will NOT be a Post-Agriculture Society. Your evaluation of the livestock men dismisses the need for the continued production of food and fiber in the coming years. The world's food supply continues to diminish.

Mame's Hole - Bear Hollow are still remote pristine area with "Old Growth" forests of conifers , Quaking Aspens and Sego Lilies. As you travel up the face of Taylor Mountain, Brush Creek Mountian the sight of the forest devastated by the damage of the Pine Bark Beetle and the cutting of wood and the roads that cut across forest and mountain meadows is a tragedy that never should have happened to our natural environment It will take centuries to restore, if that is even possible. Why add to this decimation and destruction of our natural resources?

75-1 In Alternative A and E you are suggesting the accessing of Mame's Hole - Bear Hollow with a road. Such a road would destroy the meadows in the bottom of the draw, cut through rocky mountains sides of sego lilies, quaken aspen and conifers that have been left untouched through the years. There has not been an accessible road into this high mountain area. An access road

RESPONSE TO COMMENT LETTER 75 (ELY)

75-1 Thank you for expressing your concerns. Please refer to our response 12-1.

would cause soil erosion and destroy the beauty and remoteness of Jackson Draw . These areas can be viewed from the county road that passes in the bottom of the Jackson Draw. A road into Mame's Hole - Bear Hollow would also disturb the wildlife that use those sites for home, protection and shelter. Their habitat will be drastically changed forever.

75-1 Cont. The need for access is outweighed by the preservation of the few remaining remote meadows available for wildlife and animals. These remote, yet viewable areas, are better preserved for future generations who desire to travel along a Scenic By WAy in the bottom of the draw and not see the mountain sides carved up with roads from the top of the mountains to the bottom. "Cousteau Watch" in the March 22, 1992 edition of the Morning New Tribune said, "In days ahead, natural resources may be worth more in an untouched state than when developed. They may generate more money over the long term merely by existing, like savings held in a bank, than by being exploited".

Mame's Hole - Bear Hollow and Jackson Draw SHOULD NOT be exploited by building roads into them!!!

75-2 The increased amounts of Wildlife proposed for Mame's Hole- Bear Hollow will infringe on the private land owners in Jackson Draw. I have counted larger herds of deer and elk seen there than you have listed on Table A2-1. Our private lands are closed to public deer hunters and will remain so over the coming years. Public deer and elk hunters do not make for good neighbors because of the damage they inflict on the property of the private land owners.

75-3 The building of a campsite in Bear Hollow is opposed. Unless the BLM is going patrol the area to keep the public from trespassing and desecrating the private land surrounding it. A public camp ground is available within three to five miles at the Warren Draw Reservoir (Calder's Pond).

75-4 The DMRA plan does not clearly designate those structures and properties which are privately owned and those that are public in the maps and table. An example is the grazing allotment map. A glossary of the abbreviated terms used in the charts and tables is needed. It is difficult to determine what they mean and their future use. Example A8.33 What does Res. mean? If it means Reservoirs, where are you going to build such structures? On the tops of the hills? Are those to be built on private or public lands?

75-5 BLM proposes the burning of 200 acres in Mame's Hole - Bear Hollow. We are opposed to burning of the land without knowing specifically where the burning is to take place. The last burn in that area escaped the burn area and burned the whole mountain side when the winds suddenly changed.

2

75-2 Please refer to our response 12-2.

75-3 Please refer to our response 53-1.

75-4 The abbreviation "Res." means reservoir, a description of the abbreviations has been added to Table A8-4 for readers' convenience. All range improvements are proposed to be built on public lands. Project work numbers are estimates. Exact locations would be designated at the activity plan level and are subject to NEPA review. Refer to Chapter 2, vegetation resources discussed in "Management Common to the Proposed Plan and Alternatives".

75-5 Please refer to our response 68-2.

It is unfortunate that the cost of the EIS and the projected tax dollars required for each Alternative is not also required with the Environmental Statements, so the tax payers would have an idea of what each project is going to cost and how they are to be funded.

Again, we are opposed to any development and increase in wildlife in the Mame's Hole - Bear Hollow, Jackson Draw areas.

Sincerely yours,

Sandra H Ely

Sandra H. Ely

227 South 500 West
March 24, 1992

Attention Jean Sinclair
Vernal BLM District
170 South 500 East
Vernal, Utah 84078

I wish to support Alternative E in regards to the Diamond Mountain Resource Management Plan. I believe there are many important ways we can and should use our public lands and resources. Document E gives us a well rounded emphasis which is beneficial to many instead of just a few, as the other Alternatives do (A, B, C & D).

76-1 I oppose any more land designated for phosphate mining in the Red Mountain - Ashley Creek area. I would rather see more Level 1 and Level 2 management prescriptions, which

76-2 would include protective zones around sensitive archaeological and paleontological sites.

I appreciate the BLM for its emphasis on once-common indigenous species, such as the bighorn sheep and black-footed ferret. I urge maximum protection for these and other endangered species on BLM lands.

I appreciate all you do.

Sincerely,

Tim Hadlock

RESPONSE TO COMMENT LETTER 76 (HADLOCK)

76-1 Please refer to our response 61-2.

76-2 Please refer to our response 61-1.

March 24, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Ut. 84078

Dear Ms. Smalley,

I am writing to comment on the Diamond Mountain Resource Management Plan. First of all I would like to express my support for alternative "E". It is the most balanced alternative. The others heavily favor one faction or another to the detriment of the whole.

77-1 While I support alternative "E" I still feel that there are some changes which would improve it. I believe that more acreage should be added to the level 1 and level 2 management plans. More non-commercial resources should be given protection. Many of the archaeological, riparian and scenic areas in this plan are priceless and irreplaceable. Sensitive zones could be established around such areas to prevent sites from being disturbed. I also think it would be a good idea if more surveys were made so we could be sure we know of all the special areas that need protection. Motorized access should be restricted where it has the potential to damage fragile resources. There must be a way to enforce restrictions as well, it does no good to say you are going to protect an area if you don't back it up with action.

77-2 I would like to see more adequate protection for the slickrock areas north of Steinaker. I have spent many afternoons hiking near Moonshine arch and it is clear that the area is not being managed effectively. The graffiti and trash are deplorable. This area should be closed to motorized vehicles. Private or State owned land could be acquired to create a buffer zone around the area.

77-3 Phosphate mining in the Red Mountain area is a terrible idea! I have spent quality time hiking and horseback riding there and it is too special and beautiful to tear up. This area is also critical elk and deer winter range. There was a huge public outcry when phosphate prospecting permits were applied for several years ago. The people of the Basin do not want a strip mine in this area. We already have one huge phosphate mine in that general vicinity. There has been enough land sacrificed to phosphate already! I was told in 1986 by Mr. Hadenham, former manager of the Chevron Phosphate operations, that they then had access to enough phosphate to keep them busy for 300 years. Enough is enough! I don't think they have done such a great

RESPONSE TO COMMENT LETTER 77 (DURRANT)

77-1 Please refer to our response 61-1.

77-2 Please refer to our response 70-1.

77-3 Please refer to our response 61-2.

77-3 Cont. job of restoration either. I would also like to see motorized vehicles restricted to the existing jeep trail on Red Mountain.

77-4 I think the reintroduction of animals once indigenous to the Diamond Mountain Resource Area is a great idea. We've spent several days observing some of the big horn sheep which have already been reintroduced to N.E. Utah. I look forward to further big horn sheep placements and to your planned reintroduction of the black-footed ferret. I support your proposal to eliminate bear baiting on BLM lands. I would also like to encourage you to give all protection possible to any animal species which are threatened or endangered in this management area. Every effort must be made to protect nesting sites and instream flows on a year round basis.

77-5 I would like to urge you to place the lands in Diamond Breaks and West Cold Springs Wilderness Study Areas in the Brown's Park Complex Area of Critical Environmental Concern in the event that they not be given Wilderness designation. This will at least afford them some protection.

77-6 Finally, I would like to express my support for Wild and Scenic status for the Upper and Lower Green River. This is a special and unique river. Thousands of people, including myself, take great pleasure from their experiences there. It is essential that this magnificent resource be protected.

Thank you for your time and for your attention to my comments.

Sincerely,

Brenda Durant

Brenda Durant
3264 West 500 South
Vernal, Ut. 84078

77-4 We appreciate your support for wildlife reintroductions. Please refer to our response 70-3 concerning bear baiting. We also appreciate your concerns and support for the special status animal species program. BLM Vernal District's water depletion plans for the endangered fish species in the Green River is currently being developed. This policy when finalized should help to maintain or improve instream flows and would apply to any resource management plan. The proposed plan, as in Alternative E, would also protect listed animal species' nesting sites as well as the special status raptor species, golden eagle and ferruginous hawk, nest sites on an annual basis.

77-5 For clarification, should the Diamond Breaks and/or West Cold Springs WSAs not be designated as wilderness areas, under the proposed plan these areas would be included in the Browns Park ACEC Complex and managed to meet the prescriptions for semi-primitive, nonmotorized areas.

77-6 Thank you for your support of the recommendation for designation of the Upper Green River as a wild and scenic river.

3-23-92

BLM
Vernal District,

To Whom it may concern:

78-1 I resent the segments that you have identified in the Green River, Nine Mile Creek and Argyle Creek as suitable for study for inclusion in the Wild and Scenic River System -

Please, get real!

Let the land and the BLM be for the people -!

Claudia Cox
P.O. 273
Orangeville, Ut. 84537

RESPONSE TO COMMENT LETTER 78 (COX)

78-1 Please refer to Appendix 7 for the analysis of stream and river suitability under wild and scenic river criteria.

Lorin E. Squires
2795 West 1100 North
Vernal, Utah 84078

March 26,1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Ut 84078

Dear Ms. Smalley:

I am writing in reference to the Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement. I have a copy of the management plan which I have studied. In addition I have participated in meetings of the natural resource committee of the Uintah Mountain Club and have contributed to the analysis of the plan performed by that organization. You will receive a letter presenting our support for alternative E of the plan with certain recommendations for modification. I wish to underscore the information in the Uintah Mountain Club document. I also wish to lend my support for the preferred alternative which I consider to be a good balanced plan for management of the resource area, and I hope that there will not be an erosion of this balanced management approach.

I encourage a management approach which provides for sustained utilization of the land while preserving its ecological integrity rather than a more consumptive attitude which usually is accompanied by environmental deterioration. I feel that the recommendations presented in the Uintah Mountain Club statement support this theme. I would like to focus on a few areas of concern.

79-1 The acreage listed for level one management priority under alternative E should be expanded. Additional acreage for upgrade to level 2 management should also be considered. One area that I
79-2 would like to see have more restricted management is the sandstone formation region north of Steinaker Reservoir. Please consider a management emphasis of this area which will prevent environmental degradation and preserve aesthetic quality. I
79-3 would like to underscore the designation of the plan's Areas of Critical Concern (ACEC) including designation of portions of the Green River under the Wild and Scenic River Act. I also support careful management of riparian habitats including management for mitigation of environmental degradation and also for reclamation of previously damaged habitat.

79-4 I anticipate that the use of public land by off-highway vehicle operators will increase. This will be both a function of increased population, tourist use of our area and greater recreation activity. While many vehicle operators show wisdom and respect for other people and the land, an element in this group focuses only on the thrill of the ride regardless of the

RESPONSE TO COMMENT LETTER 79 (SQUIRES)

79-1 Please refer to our response 61-1.

79-2 OHV restrictions identified for the sandstone area of Red Mountain are somewhat more restrictive in the proposed plan than they were in the draft. As stated in the proposed plan, a recreation management plan will be prepared to identify in detail how the area will be managed. This plan will address the needs of OHV users, mountain bike users, horseback riders, and individuals enjoying hiking in the area. Some give and take will be required by all parties involved to accommodate the needs of others. Any plan must include the cooperation of, and be sensitive to, the desires of private landowners in the area. Please refer to Table 2-16 for decisions for special emphasis areas under the proposed plan.

79-3 Thank you for your support for the proposed ACECs and recommendations for inclusions in the National Wild and Scenic River System.

79-4 Please refer to our responses 74-3 and 79-2.

79-4 Cont. impact of the surroundings. Some individuals also abuse their right to use our road and highway system, and for this reason we have laws and regulations to govern vehicle use. I urge the district managers to develop a plan for the management of OHV's on BLM land and include in that plan restricted use of these vehicles in areas with sensitive vegetation, cryptogamic crusts and easily erodible soils. The slickrock region on the slope of Red Mountain should be included in the restricted zone. Attention should also be given to the concerns of hikers and other non-vehicle recreationists who often feel that noise and interference by OHV activity degrades their recreational experience. I enjoy the use of off-highway vehicles but have been appalled by the environmental damage I have witnessed in this and other parts of the state and would hope that such damage can be mitigated.

79-5 I am personally opposed to phosphate mining in the Red Mountain to Ashley Creek area and would support an addition to the plan restricting mining activity in this area. I reiterate my support for the preferred alternative, alternative E, and hope that the district will resist efforts to alter this alternative in preference to alternatives A, C or D. I also strongly encourage careful consideration toward incorporating the Uintah Mountain Club's recommendations into the preferred alternative.

I commend BLM personnel for the efforts that have gone into the preparation of this plan and hope that effort and resources for implementation will be forthcoming. Thank you for your consideration of my comments.

Sincerely,

Lorin E. Squires

79-5 Please refer to our response 61-2.

CLIFFORD AND LENORA SMITH
DAGGETT CO. UT. RD. 26056, BX 4
MAYBELL, CO., 81640

23 MARCH 1992

Jean Sinclear
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Jean:

Our comments to the DMRA are submitted herewith. We would like to state that review of this plan in a 90 day period has put us at a disadvantage. In the process of identifying our Browns Park area from all other areas and then analyzing the impact of what is already in effect and all the subsequent changes has been a frustrating effort. There are segments of each alternative that we concur with however there is no one alternative that is acceptable.

Specific areas of concern are as follows:

80-1 1. Utilities corridor: The existing pipelines should remain as is as of 1991. There has been enough scarring of the land. No further pipelines should be allowed.

80-2 2. Airstrips on Taylor Flat and Willow Creek: These airstrips have been utilized by fisherpersons, charter fishing guide services, DWR to spray noxious weeds, and your organization to seed burned areas. They have also been used in medical emergencies. It is our understanding that they are depicted on road and air maps. They should be maintained by your agency as they are on public lands.

80-3 3. Livestock Grazing: We feel the present AUM's should not be increased.

80-4 4. Wildlife Habitat: Development of habitat should be of the type that does not require special watering. A species should be found that survives the existing weather and soil conditions.

80-5 5. Fire Management: Prescribed burns should be eliminated. The existing sage brush, pinyon-juniper stands provide watershed. Chaining and burning has reduced this area within the last 6 years. We have experienced flash flooding in the past and we believe this would occur if controlled burns are initiated again. The suppression areas should be increased to 1-2 miles. from private lands and buildings if controlled burns are allowed.

80-6 6. Reintroduction of Bighorn Sheep: We do not favor this

RESPONSE TO COMMENT LETTER 80 (SMITH)

80-1 The planning process identified a need for a north-south utility corridor, primarily to facilitate transportation of oil and/or gas between Utah and Wyoming. Jesse Ewing Canyon presently has three major pipelines and has been determined to support up to 3 more pipelines. The route depicted for this utility corridor basically follows these existing pipelines. Thus it is expected that the critical wildlife habitat and visual qualities of Browns Park would be maintained.

80-2 While we agree that an emergency landing strip may be needed in the Browns Park area, portions of the two existing strips are presently in trespass, creating an identified need for their resolution. BLM is not in the business of managing landing strips and would seek another entity to manage them.

80-3 The proposed plan would establish livestock preference at the present level of 50,299 AUMs, please refer to Table 2-15 under livestock.

80-4 Our standard reseeding procedures are to plant species that meet BLM forage and watershed objectives and can survive existing soil and weather conditions. Plants have been watered at the Taylor Flat study exclosure for a special study. It would not be practical for BLM to water plants on the open rangeland.

80-5 Refer to vegetation resources in the Planning Criteria in Chapter 1 and Management Common to the Proposed Plan and Alternatives in Chapter 2. Fire is an approved tool to meet activity plan objectives. Crucial deer winter range in Browns Park is a priority suppression area. The Browns Park home owners on Taylor Flat are within the crucial deer winter range.

80-6 The proposed plan would allow for the reintroduction of up to 400 bighorn sheep on public land in the Browns Park-Three Corners area, placing a seasonal restriction to surface disturbing activities (September 1 through June 30) to protect existing rutting and lambing areas. We would also like to take opportunities to eliminate domestic sheep grazing on public lands through negotiations to reduce the potential of disease transmission between domestic and wild sheep. No road closures have been proposed related to the reintroduction of bighorn sheep. We recommend you discuss your hunting concerns with UDWR, the agency responsible for management of big game and regulating hunting seasons. Your contention that bighorn sheep will attract more tourists may be true, however, we anticipate a much larger increase from river recreationists than would be expected from bighorn sheep enthusiasts. We have expanded our Bridge Hollow facilities and will be improving our Indian Crossing Campground and Jarvie

DRAA Comment Letter Continued

80-6 Cont. action. The development of habitat for the sheep will require burning. We fear the impact of the reintroduction to our present way of life by the closure of roads, hunting and grazing by livestock. The plan cites restrictions of one mile and ten miles. Placing sheep in this area of the quantities stated will attract more tourists, environmentalists and photographers yet there are no plans mentioned for facilities such as restrooms and new roads. The time to budget all costs is now, not at a later date.

80-7 7. Jarvie historic Site: We would like to see preservation of the heritage of Esther Campbell at the Jarvie site. The rock garden in particular as that is all that is left. This was history in the making and should be retained. Many of the trees and shrubs have been destroyed by beavers and fires. The many seedling of trees on the property could be transplanted. The sidewalks placed for the physically challenged detracts from the historical theme. Utilization of Golf carts to service the people would have been a viable alternative.

80-8 8. Tourism: BLM and DWR should share in the costs to maintain and improve the roads (i.e. paving). Costs should be included in your budgets. Special consideration for widening the dugway from the Taylor Flat Bridge to 1/3 mile to the east should be included in the plan. When traveling the roadway, the scenery is beautiful and could be a distraction to a driver. The roadway is narrow and has blind spots to oncoming traffic. The widening of the roadway would not be visible from the river level as the road is several feet above it.

80-9 9. Sanitation Facilities and Landfill Area: With the increase of tourism the one garbage trailer on Bridge Hollow is not sufficient. Establishing a landfill area would encourage proper disposal of garbage. Placing restrooms facilities at 2-3 mile intervals from Bridgeport to Swallow canyon would reduce human waste along the river.

80-10 10. Riparian Areas: These areas along the river seem to sustain the activity of persons and the livestock grazing on the Jarvie Site. Increased flows from the dam would have a more devastating effect in the event of heavy spring runoffs.

80-11 11. Red Creek Drainage: This area should be a high priority. Coordination with Wyoming BLM should be initiated to prevent the flow of silt into the Green River. Construction of catch basins should be implemented immediately.

80-12 12. Wild and Scenic River Designation: We feel this designation will have an adverse affect on the private landowners and citizens in Browns Park. The economy of Daggett County could be impacted. The present tax base is at 8%. The Federal and State agencies have more than enough control over the river and

-2-

Historic Site to meet some of these needs. These facilities will have adequate restrooms and roads to meet the future public needs.

80-7 The Jarvie property was acquired by BLM to preserve and interpret the history of John Jarvie between 1880 and 1909. Although there may be a value in preserving the heritage of Esther Campbell, we do not feel that it should be done at the Jarvie Historic Site. The sidewalks were installed at the historic site after consultation with the State Historic Preservation Officer. They are intended to make it more accessible to the physically challenged. Various other alternatives were examined, but none were found to be satisfactory.

80-8 The road of concern is a county road. Daggett County is responsible for maintenance and safety problems along its route.

80-9 If more than one garbage trailer is needed at Bridge Hollow, another one will be provided. Establishing a landfill area in Browns Park would be much more expensive at this time than hauling garbage to Dutch John or Vernal. We agree that additional restroom facilities are needed in Browns Park along the Green River. These will be provided over time as funding permits.

80-10 Livestock grazing on the Green River in Browns Park under the proposed plan would be open to restricted grazing on a case-by-case basis only as a biological tool to control noxious weeds or to maintain or enhance wildlife habitat (refer to the ACEC prescriptions for livestock in the proposed plan). Periodic flooding during heavy spring runoffs has the potential to expand or improve riparian areas.

80-11 The majority of the watershed for Red Creek is in Wyoming. Wyoming BLM is currently planning watershed improvement projects as part of the Green River RMP which is also currently in development. BLM in Utah has built 115 reservoirs as part of the existing Red Creek Watershed Plan. We have added these reservoir numbers to Table A8-1 under the Clay Basin Allotment. BLM proposes to build 15 more reservoirs under the proposed plan. See Table A8-4, Clay Basin Allotment.

80-12 Please refer to our response 36-1. Toliver Creek was on a list of streams looked at for possible wild and scenic river designation, but it was determined that it did not meet the criteria for further study. It is proposed to be dropped from further study.

DRMA Comment Letter Continued

and lands in this area.

80-12 Cont.

The citizens of Daggett County would like to take the initiative to develop tourism consistent with the history of the ranches, sports and outdoors persons way of life.
The list of rivers and streams includes Toliver Creek which runs thru our property.. We question the inclusion as the only time there is water is during spring runoff. Buffer zones on either side of this creek would affect our lands. We oppose this inclusion.

We are sure there are more areas of concern we should have addressed. Some of the statistical data seemed questionable, however not enough time was available to verify.

We do not want our quality of life to be impacted unfavorably. We have family that share our love of the area and we intend to leave our land and home and culture that we have built for the past 18 years to our children and their future.

We would like to be able to continue to care for the area and take our part in protecting the existing beauty without further restrictions.

We wish to be included in the remaining phases of this plan.

Respectfully submitted,

Clifford Smith

Clifford Smith

Lenora Smith

Lenora Smith

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
12795 W. Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287

IN REPLY REFER TO:

L7619 (RMR-PP)

MAR 25 1992

Memorandum

To: Team Leader, Diamond Mountain Resource Management Plan/Environmental Impact Statement, Bureau of Land Management, Vernal, Utah

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Diamond Mountain Resource Area Draft Resource Management Plan and Environmental Impact Statement (DES 91/0034)

The National Park Service (NPS) has reviewed the above-referenced document and offers the following comments.

Management of Bureau of Land Management (BLM) lands is of concern to the National Park Service (NPS) because actions taken on these lands may impact units of the National Park System or other areas where the NPS has program responsibilities. One unit, Dinosaur National Monument, as well as several National Natural Landmarks, could be impacted by activities proposed in this document.

Based on our NPS responsibility to protect monument resources and resource values, we recommend adoption of Alternative E (preferred alternative) with modifications based on our recommendations in this response. Without those modifications, we recommend adoption of Alternative B (ecological systems).

The proposed action generally classifies areas adjacent to Dinosaur National Monument as Management Levels 3 and 4. In Alternative B, those same lands are generally classified in Management Level 2.

82-1 The document indicates that lands adjacent to Dinosaur National Monument include high sensitivity paleontological zones, relatively low mineral potential, high values for a variety of wildlife, critical watersheds, and 100-year floodplains. The lands inside the monument also have high public values for wildlife, paleontological resources, public enjoyment and recreation, watershed, and solitude. Adoption of Alternative E with designation of lands adjacent to the monument in Management Levels 3 and 4 would not adequately protect monument resources and park values.

RESPONSE TO COMMENT LETTER 82 (NATIONAL PARK SERVICE, Snyder)

82-1 BLM specialists independently portrayed resource values, restrictions and management levels they determined were needed to protect resource values on public lands. This analysis resulted in lands adjacent to Dinosaur National Monument being placed in management levels 2, 3, and 4. We feel these management levels are adequate to protect resources without compromising the resource values within the monument. Adjoining landowners would be consulted prior to initiating any actions that may affect them.

82-1 Cont. Alternative E would likewise not adequately address similar values on contiguous public lands covered under this draft plan. Of particular concern is one block of land immediately contiguous with park lands that is recommended as Management Level 4 (open management). We suggest that open management is an inappropriate designation for any public lands adjacent to Dinosaur National Monument.

Given BLM's affirmative obligation to consider and aid in the protection of park resources and resource values, Alternative B more closely fits as the preferred alternative on lands immediately adjacent to Dinosaur National Monument. A modified Alternative E (preferred alternative) that would enhance protection for adjacent lands by redesignating those lands from Management Levels 3 and 4 to Management Level 2 would be an acceptable alternative.

We appreciate the opportunity to review this document. Our general comments are enclosed.

Michael D. Snyder

Michael D. Snyder

Enclosures

NATIONAL PARK SERVICE COMMENTS ON DIAMOND MOUNTAIN RESOURCE AREA DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Mineral Resources

Our comments address only those areas in which oil and gas operations could impact the resources of Dinosaur National Monument and are directed toward inconsistencies within (a) the mineral potential classification, and (b) the management alternatives.

82-2 We have difficulty reconciling the regional geology of the "Horseshoe Bend-Ashley Valley Region (HB-AV)" surrounding the park with the "moderate" hydrocarbon potential and the oil and gas play type assigned to it (depicted on Maps 3-12 and A4-1, respectively). Examination of the geology indicates the dominant feature here is an upthrown block, bounded on the north by the Island Park fault and on the south by the Wolf Creek fault, and cored by exposed Mississippian age rocks along its axis. This area is topographically expressed as Split Mountain. The north flank of this block, situated on the moderate potential land, is the overturned southeast limb of a syncline, exposing Pennsylvanian through Jurassic age rocks on the hanging wall block, and Jurassic through Cretaceous age rocks on the foot wall block. The axis of the syncline is overturned beneath the Island Park fault, and the northeast limb climbs gently to the northwest where it crops out in the Diamond Mountains. One of the three producing formations in the HB-AV region, the Pennsylvanian Weber, is breached all along the north flank and on the westward plunging nose, enhancing the probability of reservoir flushing. Both regional structure and surface exposures suggest this is an unlikely area for hydrocarbon accumulation.

Examining the well information in the area surrounding the monument further supports our contention that the area would be more appropriately categorized as "low potential." There were only three wells drilled adjacent to the monument. The Hiko Bell Jensen well number 1 was drilled in Township 3 South, Range 23 East, Section 28 to a total depth of 6,208 feet to the Weber formation. Only a very light cut of crude was found with the drill mud. The well was subsequently plugged and abandoned. The Union Texas Rammison 7-1, Township 4 South, Range 23 East, Section 7, was drilled in August of 1980 to a total depth of 8,285 feet. The drill stem test indicated no presence of hydrocarbons, and recovered fresh water at 8,000 feet. As with the Hiko Bell well, this well was plugged and abandoned. The final well was located in Township 4 South, Range 23 East, Section 34. The target formation was the Weber at 5,552 feet. There was a weak blow of gas at 2,890 feet that died in 5 minutes. Again, this well was plugged and abandoned. In fact, there is no production anywhere between the two areas of outcrop mentioned above. The fields discussed in the HB-AV region are all located west of the monument, closer to Vernal.

Two other zones (Tertiary Green River and Uinta Formations) are described in the document as having hydrocarbon potential in the HB-AV area. Examination of the surface geology in the area immediately adjacent to the park indicates the Tertiary section was either denuded or never deposited anywhere between the park and the Diamond Mountains. We dispute the inclusion of this area in the "Tertiary Shallow Undiscovered Oil Play" when these rocks are not present.

82-2 Moderate and low mineral potential lands are defined in the Glossary (please refer to page G.8 "Mineral Potential"). Published subsurface maps indicate that the subsurface geologic environment is favorable north of the Dinosaur National Monument boundary. Both the Hiko Bell Jensen No. 1 exploratory well and an additional Hiko Bell well (Township 4 South, Range 23 East, section 34) indicate that both wells had shows of either oil or gas. Therefore, based on the definitions of mineral potential in this document, it seems appropriate not to change the designation of the potential of the lands north of the Dinosaur National Monument boundary.

We agree with your comment that Tertiary strata is not present at the surface surrounding Dinosaur National Monument (please refer to Map 3-11. Therefore, we agree that draft Map A4-1 which displays "Tertiary Shallow Discovered Oil Plays" as present adjacent and within the Monument is in error. Please refer to final Map A4-1 to note the correction.

2

While the Horseshoe Bend-Ashley Valley Region is undoubtedly hydrocarbon rich, we question the inclusion of the area surrounding the nose and flank of the uplift. Both surface and subsurface information available indicate that this is a poor area for oil and gas production and should be categorized as having "low potential." By doing so, either careful or restricted minerals management guidelines could be imposed in the area surrounding the park with minimal adverse effect on the oil industry.

Visual Resources

82-3 The document shows Visual Resource Management (VRM) classes in Map 3-33 (page 3.71) within the Resource Area. Nearly all of the lands adjacent to the monument are in classes III and IV. Given the high value associated with scenic vistas in, to, and from the monument, we recommend that these adjacent lands be reclassified to higher value VRM classes that would offer added protection to this important public resource. This is especially important for areas adjacent to Dinosaur National Monument proposed wilderness zones.

Solitude

82-4 Solitude is a very important resource value within Dinosaur National Monument. Through ambient sound monitoring, we have established a baseline that documents the near absence of man-made sounds in the monument. L90 sound levels in backcountry areas are consistently in the low to mid-20 dB range. L50 averages seldom exceed 30 dB. Developments on lands adjacent to the monument could result in significant deterioration to this resource value. Adoption of our recommendations relative to management level reclassification would significantly protect the quality of solitude in the monument.

Fire Management

We commend your plan for the inclusion in the preferred alternative of prescribed natural fire management. Our respective Fire Management Officers have coordinated fire management efforts for compatibility over the past several years and we anticipate that will continue under the final plan.

82-5 Several places in the document (e.g. page 2.21) refer to maintaining late seral or climax vegetation conditions on 60 to 70 percent of the subject lands. We did not find your rationale that describes the fire or other disturbance regimes that would set back seral stages. Perhaps in some situations with frequent natural disturbances, more of a mosaic of seral stages would be desirable.

Wild and Scenic Rivers

82-6 Alternative B (ecological systems) proposes consideration of Wild and Scenic River designation for both the "middle" and "lower" reaches of the Green River. The "middle" reach is that section immediately below Dinosaur National Monument. Alternative E (preferred alternative) proposes consideration of such designation for only the "lower" reach. Given the potential to better protect high-value endangered fish habitats and riparian zones, as well as consistency in considering designation of the entire Green River below Flaming

82-3 Visual resource classes, as used in this plan, were developed using standard BLM criteria by an independent contractor in 1979. We appreciate the National Park Service's concern over scenic vistas that go beyond monument boundaries, but feel the VRM classes as shown accurately describe the appropriate classes on the lands administered by BLM.

82-4 Thank you for your comments. As stated in the standard operating procedures of chapter 2 of the proposed plan, BLM will prepare site-specific environmental reviews before many of the actions proposed in this plan are implemented. The NEPA process calls for inclusion of consultation with private individuals, local governments and governmental agencies that would be affected by the proposed action. The proposed plan goes on to state explicitly that BLM-approved actions on public lands would be coordinated fully with adjoining landowners, local governments, and anyone with a valid existing right on the land (i.e., grazing permittee, mineral lessee).

82-5 Please refer to Table 2-15 under vegetation for ecological stages proposed by alternative. Management of the vegetation would be done by various practices of which prescribed burning is one. Refer to Appendix 8, Table A8-4 for rangeland management treatments or practices proposed by allotment. Refer to Chapter 4, under impact analysis of implementing the proposed plan regarding impacts from vegetation management to other programs.

82-6 Appendix 7 lists in detail the reasons BLM is not proposing to recommend the middle reach of Green River for designation as a Wild and Scenic River.

3

82-6 Cont. Gorge Dam, we suggest that the preferred alternative be amended to recommend consideration for both the "middle" and "lower" reach of the Green River within the Resource Area.

Recreation Development

82-7 The document notes that recreation facilities may be developed in areas near Dinosaur National Monument (e.g. Jones Hole area). The Monument staff looks forward to cooperating with BLM in planning and design efforts to ensure our respective developments are compatible with efficient visitor services and protection of resources and resource values.

Grazing

82-8 The RMP/DEIS notes continuation of grazing by domestic livestock adjacent to the monument in all of the alternatives. With each alternative there are shades of differences in how that grazing will be authorized and managed. Grazing adjacent to the monument, particularly where the boundary is unfenced, has direct and indirect impacts on park resources and resource values. As you know, grazing of domestic livestock is generally prohibited on lands administered by the National Park Service. Recent history has shown that where early consultation is lacking in our respective management of grazing, both Agencies and the permittee are impacted. We make two recommendations relative to management of grazing:

1) The DEIS should be amended to acknowledge the impact of permitted grazing on BLM lands to park resources and resource values as a result of trespass grazing. These problems (existing and potential) can be significantly reduced by construction and maintenance of adequate boundary fences. The DEIS should note that more efficient use of BLM lands and protection of park resources would accrue with BLM participation in boundary fencing programs.

82-9 2) In implementation of the RMP, earlier and more complete coordination and consultation in the design and location of range improvements, water developments, and grazing systems will significantly reduce the potential for impacts to park resources and conflicts with authorized BLM permittees. We again recommend that both Agencies endeavor to maintain such coordination and consultation.

Threatened and Endangered Species

82-10 The document should be amended to reflect completion of the formal endangered species listing process for Ute Ladies Tresses orchid (threatened) and razorback sucker (endangered).

Employment

82-11 Table 4-3 (page 4.14) projects impacts to jobs by alternative. That table is drawn from a U.S. Forest Service publication without reference to its

82-7 Thank you for your comments and offer of assistance.

82-8 The Wild Mountain area you may be referring to is within Colorado, and is outside the management boundaries of DMRA. The management responsibilities for Wild Mountain lie with the Little Snake Resource Area of the Craig District. DMRA administers the area in conformance with the management direction contained in the Little Snake RMP. We agree, trespass problems from BLM-permitted livestock drifting onto National Park Service-administered lands must be solved through continued coordination and consultation efforts. It is however the grazing permittee's responsibility to insure BLM-permitted livestock remain where authorized. New range improvements on BLM lands will be planned in such a way to minimize trespass problems occurring on National Park Service-administered lands. We also agree fencing through a cooperative effort may be a solution to a trespass problem.

82-9 See our response 82-8 above.

82-10 Thank you. Chapter 3 has been updated to show the most current status for Ute Ladies Tresses orchid and razorback sucker.

82-11 This table has been deleted.

82-11 Cont. applicability to the BLM RMP alternative. Given current levels within the Diamond Mountain Resource Area, it seems questionable that adoption of Alternative B would result in a loss of 3,100 jobs in the oil and gas industry. We recommend that supporting documentation be provided or that this table (and similar narrative) be deleted.

Paleontology

82-12 On page 2.34 the plan calls for surface collection of fossil invertebrates and plants and later amateur collection of fossil vertebrates (pending BLM approval). This is to occur in areas identified as having High Sensitivity (page 3.6). The proposed management actions are inappropriate for the noted sensitivity of the resource. The professional paleontology staff at the monument is familiar with some of the exposures and formations in these areas and some fossil invertebrates and plants that would be of high scientific significance if they were found in these areas. The blanket assumption that fossil invertebrates and plants are not significant is erroneous. The potential for significance needs to be evaluated for each formation before open collection is allowed.

82-13 The collection of fossil vertebrates by other than scientific institutions should not be allowed. Rarity and uniqueness of fossil vertebrate remains mean that most specimens will have high scientific value that will be lost if amateur collection is allowed.

82-14 These activities will be occurring on lands contiguous to Dinosaur National Monument. It is our historical experience that opening adjacent areas to amateur collecting will have negative impacts on our resources through increased illegal collecting.

82-15 On page 3.5, the chart showing paleontological resources is highly biased towards vertebrate fossils. No mention is made of potential for significant plant and invertebrate fossils. A more comprehensive scientific evaluation is needed for this section (the source listed is the Vernal District files).

82-16 According to your draft plan, over 300 fossil localities are known with only one percent of the land surveyed, yet all the land is to be opened to amateur collection. Such richness should dictate continued closure at least until an adequate baseline inventory and scientific evaluation has been done.

82-17 On page A1.2, the paleontological mitigation guidelines noted are those of the Utah State Paleontologist. There is no indication that they will be adopted by BLM, how they will be implemented, or how such actions will be used to manage areas as a result of this planning document. Nearly all the classes of paleontological sites listed require some mitigation. Only the last, Class V, requires no mitigation. Even then, intensive survey is required before this class ranking is to be assigned. The plan simply calls for opening the area for amateur collecting of fossil plants and invertebrates. The apparent preferred management action is not in consonance with the mitigation chart in the document.

82-12 The paragraph you refer to has been changed in the proposed plan, please refer to Table 2-15. The potential for significance will be evaluated for all formations within areas proposed for collection.

82-13 The paleontological resources section in the proposed plan has been changed to consider both plant and invertebrate fossils. The paleontological resource map in Chapter 3 of this document, has been modified to include additional highly sensitive paleontological zones. Casual use collection of vertebrate fossils within the resource area will not be allowed. However on a case-by-case basis, collection of vertebrate fossils by a scientific institution could be considered.

82-14 All lands will not be open to collection. Collection will be permitted only at specified locations following BLM approval.

82-15 Our intent is to follow the mitigation guidelines developed by the Utah State Paleontologist. It should be noted that BLM's policy on management of paleontological resources is still being developed. The BLM State Paleontologist will work closely with the Utah State Paleontologist in finalizing this policy. The chart showing paleontological resources has been expanded in the proposed plan.

82-16 Please refer to the response provided above to comment 82-15.

82-17 Paleontological inventories will be conducted on all sensitive formations before surface disturbing activities will be permitted. If fossils are found, their significance will be evaluated and if necessary mitigated through avoidance or excavation by qualified individuals. Amateur collecting will be closely regulated by BLM.

5

82-18 The plan does not adequately address paleontological resources. The potential for scientifically significant material is high for the areas covered by the plan, yet there is no attempt or plan to inventory and access those resources. Management actions appear to be based on seriously deficient baseline data.

82-19 There is no discussion on how development (roads, stock ponds, etc.) on these lands will impact fossils or how such impacts will be mitigated. Overall, the plan proposes activities that will in all likelihood result in the loss of valuable scientific material. In addition, unregulated amateur collecting in areas contiguous with Dinosaur National Monument lands poses a strong potential threat to our own nationally protected fossil resources.

National Natural Landmarks

82-20 The National Park Service administers the National Natural Landmark (NNL) program. The purpose of the program is to identify significant ecological and geological features that make up our Nation's rich natural history. The objectives for the program are: 1) to encourage the preservation of sites illustrating the ecological and geological character of the United States; 2) to enhance the scientific and educational value of sites thus preserved; 3) to strengthen public appreciation of natural history; and, 4) to foster a greater concern in the conservation of our Nation's natural heritage.

The following potential NNL's are within the Diamond Mountain Resource Area:

1) Ashley Creek Canyon
2) Asphalt Ridge
3) Sheep Creek Canyon
4) Sheep Creek Narrows
5) Hickerson Park
6) Castle Cliffs of Duchesne
7) West Hanna Narrows
8) Hidden Valley Badlands
9) Duchesne River Bluffs

Enclosed are copies of the approximate locations and descriptions of each area from our files and informational materials on the NNL program. Please consider the opportunities to preserve our Nation's natural heritage in the Diamond Mountain Resource Area Management Plan. Please contact Cheryl A. Schreier at (303) 969-2929 if you have questions regarding these potential NNL's.

82-18 We believe the changes to made to Alternative E in response to public comment as reflected in the proposed plan are adequate.

82-19 Please refer to our response 82-17 above.

82-20 Of the 9 potential National Natural Landmarks (NNLs) listed in your comment, only two, Ashley Creek Canyon and Asphalt Ridge, contain public lands surface managed by BLM.

Ashley Creek. That portion of the potential NNL south of the Ashley National Forest contains Ashley Springs which is used by much of Ashley Valley for both culinary and irrigation water. It also contains a culinary water treatment plant. All public land in the area is withdrawn to protect this important water supply. Our position is that the portion of the potential NNL on public land does not meet the criteria for designation and should be removed from further consideration.

Asphalt Ridge. Of the 640 acres in this potential NNL only 40 acres are controlled by BLM. The area is being actively mined by Uintah County for road asphalt. It is our position that the area's principle value is as a source of asphalt. It does not meet the criteria for designation and should be dropped for further consideration.

Carl E. and Myrna A. Cobbs
1728 East 1700 South
Vernal, Utah 84078

March 27, 1992

Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Attn: Penelope Smalley - Team Leader

Re: Diamond Mountain Resource Management Plan

Dear Ms. Smalley;

In reviewing the Diamond Mountain Environment Draft Statement, we have come to the conclusion that it is so complex and not understandable that I and my wife are both having real problems trying to come up with the logic that this statement is trying to make.

We have a small summer home on Pot Creek and we also own land in the Warren Draw. We have Studied your proposals and our recommendation would be to let the B.L.M. manage their property in exactly the way they have during the past years and not to try to impose the environmentalist ideas into a plan that will not work.

83-1 We are completely opposed to opening public roads through private land ownership areas. There are so many problems associated with the taking of private ownership rights that we recommend and ask that these proposed actions be taken out of this environmental statement.

Leave the Davenport, Lambson, Jackson and Warren Draws as they are. Leave Red Mountain and Ashley Creek as they are.

Carl E. Cobbs

Carl E. Cobbs

Myrna A. Cobbs

Myrna A. Cobbs

CEC/MAC/jk

RESPONSE TO COMMENT LETTER 83 (COBBS)

83-1 We appreciate your concern. Please refer to our response 12-1.

March 26, 1992

Penelope Smalley-Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal UT 84078

To whom it may concern:

This letter is about the Diamond Mountain Management Plan and Environmental Impact Statement in the Jackson Draw area.

84-1 After reviewing the above plan it is my understanding that the organization is intending to make a road from the Jackson Draw to the Davenport Draw by way of Maimes Hole and create a picnic area in Bear Hollow.

These plans are not in the best interest to the many different types of wildlife in the Jackson Draw area. For instance, Maimes Hole is one of the popular calving sites for the elk in the Jackson Draw. If this is disrupted they will have to moves on to other sites. The road and picnic area will also bring in more hunters to go along with the already diminishing elk and deer herds in the area. It is my feelings that these plans are going to bring more people into the area and move the wildlife out.

As a sportsman and outdoorsman I have seen what unlawful people can do to roads and lands. They cut fences, harass cattle, litter and trespass on to private land without permission just to name a few. If we let this action pass these areas are not going to be the same as they have been for generations.

It is not only the outdoorsman and wildlife that are being punished but also the land owners whom have ranched these lands for generations. And now you tell them they have to make public access through their lands.

It is my concern that these actions should be removed from the Management Plans.

Concerned

DUSTIN HENLINE

RESPONSE TO COMMENT LETTER 84 (HENLINE)

84-1 Thank you for expressing your concern. Please refer to our response 12-1.

RESPONSE TO COMMENT LETTER 85 (BAESE)

Vernal, Utah

To: Penelope Smalley, Team Leader
Bureau of Land Managment
Vernal District
170 South 500 East
Vernal, Utah 84078

As a concerned citizen I would like to comment on the Diamond Mountain Resource Managment Plan and Environmental Impact Statement.

Although my comments could pertain to many other areas of Diamond Mountain I would specifically like to direct my concerns to the Jackson Draw area since I am familiar with this section. As I understand it most of the meadowlands and water is owned by the Hacking and McCoy family, and I would like to commend them on the way they have handled the problem of tresspass in the past, not only tresspass but access to BLM land which is of course what this is all about.

I have had the privilege of hunting in this area for many years. And in that time I have seen many other hunters , some with permission to tresspass and others with no permission. I might add that most of the people that tresspass without permission do not even contact the landowners to ask for permission. I have seen both elk and deer killed and left for the coyotes and birds of prey, I have also seen the meadowlands torn up by four wheel drive trucks in the wet season, fences knocked down and gates left open, and still these landowners let many hunters on their property and all they ask of us is to protect what is rightfully theirs.

Another thing that concerns me very much is the portions of the Jackson Draw, specifically "Maimes Hole" and "Bear Hollow" are both calving areas for as many as 250 head

of elk. I have observed this every spring for many years. Both of these areas can be seen with binoculars and spotting scopes from the county road, so there should no need to any type of road access into these areas.

One more thing I should mention is what seems to be the growing number of moose in this area. Last year 1991, I observed 5 moose in the Kaimes Hole area during the general elk hunt. Also almost every year several bear are spotted in this general area, and again all of this can be seen from the main road that goes through the Jackson Draw. Now you tell me what is going to happen if public access is allowed in these areas? I'm sure we all know it would have a very adverse effect on the wildlife in this area.

85-1 Going back to the issue of the BLM land in the Jackson Draw, anyone wanting to gain access can do so from either the south or north ends and also from the Warren Draw to the east. So what could possibly be gained by opening up public access through the very delicate meadowlands which are privately owned, other than creating many bad feelings between landowners and concerned citizens but, most infringing upon what seems to be a haven for deer, elk, moose and mt. lion.

I hope you will consider my input in any future plans for whatever changes are made in this very special area of Diamond Mountain.

Yours Truly,

Karl J. Baese- owner Split Mountain Hotel
1015 East Hwy 40
Vernal, Utah 84078
801-789-9080

85-1 Thank you for expressing your concerns. Please refer to our response 12-1.

Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

RE: Diamond Mountain Resource Management Plan

Attn: Penelope Smalley, Team Leader

Dear Ms. Smalley;

After Reviewing the Diamond Mountain Environmental Draft Statement, I feel it is my duty as a sportsmen and a supporter of the outdoors to express my feelings on this issue.

86-1 My concerns are particularly focused on the area of northern Diamond Mountain - including the Davenport, Lamson, Jackson and Warren Draws. Most of the area consists of FEE lands which are mainly in the low lying areas of the Draws and are particularly used for grazing by the land owner or the lessee. The remainder of the land being B.L.M., State & National Forest.

During the past decade my family and I have enjoyed some of our most memorable moments in these areas, mostly due to the fact of limited accessability to the area. The abundance of wildlife in the area in my opinion is contributed to this fact. We have witnessed
the ELK calving seasons, ELK & DEER rutting seasons, BEAR, MOOSE and MOUNTAIN LION. (FROM THE MAIN ROAD !!)

If public access is opened in these areas to allow anyone to roam through PRIVATE land to reach one destination or another then Diamond Mountain as we now know it, will not be what we had hoped that our children and grandchildren could enjoy. There is plenty of access to state and federal lands now if people would decide that there are other ways to reach an area other than a four wheel drive pickup. Some of the tops of these draws are as close to a wilderness setting as the people in this area will likely see. If it is ruined by roads then that distinction can never be regained.

Another concern to me is the landowner which seems to be affected as much as our wildlife and habitat. In most cases their ancestors homesteaded the mountain land for the use of its rich grass lands for grazing. The thought of seeing a public access through the middle of one of the very large pastures makes me cringe. The land owners have a lot of time, money and sentimental value into their land and I do not think that anyone has the right to change or alter their property in any form without their consent.

RESPONSE TO COMMENT LETTER 86 (HENLINE)

86-1 Thank you for your concerns. Please refer to our response 12-1.

I think that the B.L.M. should focus their concerns on protecting the resources and not try so hard to expose that which we still have. I highly recommend that the actions which I have addressed be removed from the Management Plan.

Concerned:

TRACY D. HENLINE

TDH/tdh

RESPONSE TO COMMENT LETTER 87 (MASSEY)

March 17, 1992

Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

ATTN: Penelope Smalley

Gentlemen:

As a concerned citizen I would like to comment and express some opinions pertaining to Table 2-13, Lands and Realty, in the access portion of Table 2-13. According to alternative E, which is the Bureau's preferred alternative, you are seeking public access through privately owned property. My main concern in this proposal is the Jackson Draw portion, with which I am most familiar.

The Hacking's and McCoy's are the only land owners in the Jackson Draw and are opposed to any further access through or across their private property. They already have a public road right through the heart of their property. From this road they have lost a number of livestock over the years, to both vehicles traveling at excessive speed, or being shot.

Furthermore, there is not one spot along the Jackson Draw where a road would not disturb some kind of archeological site. I talked with a B.L.M. representative at the Elk Expo in Salt Lake City. According to the gentleman, the Bureau was not going to push an access on anybody that didn't want it. I hope very much this is true.

I, along with may others, have been fortunate enough to have access to this area. These land owners are very good to deal with, yet they are always having trespass problems during the hunting seasons. This is mainly due to hunters shooting game off from the main road. Any further access via road would greatly intensify this problem.

There is access to either side of the Jackson Draw. From the south there is D.W.R. property that joins the B.L.M. land, from the north there is National Forest property and from the east there is D.W.R. property that joins B.L.M. land. So for those willing to gain access, it's already there.

I suspect that whomever proposed or is wanting this access, probably wants to be able to road hunt more of this private property.

This area, the Jackson Draw, is a haven for many species of wildlife, even though there is a very heavily used public road right through the heart of it. In the spring it serves as a calving ground for a large herd of elk and many deer. The moose in this area have been on the increase for the past ten years. The area, as is, supports bear and cougar in a fair amount. Any further access would severely impact this ongoing habitat.

Please, before you take any of the access issues in the Land and Realty sections in table 2-13 into any further action, consider the impact on the wildlife, land owners, and archeological sites, that it may effect. I think you need to do a little more homework on the issue. As an advocate of more habitat for wildlife, I believe that fewer roads mean more habitat.

87-1 I am strongly opposed to public access in the Jackson Draw area. Thank you for your consideration of my comments.

Very truly yours,

Nolan Massey

Nolan Massey
1398 West 400 South
Vernal, Utah 84078

87-1 Thank you for expressing your concerns. Please refer to our response 12-1.

Attention: Jean Sinclear March 19, 1992
Bureau of land Management
Vernal District

As a concerned citizen and a person who truly enjoys the recreation offered by our area, I would like to comment on the Diamond Mountain Resource Management plan and Environmental Impact Statement, Specifically the Area of Diamond Mountain Known as "Jackson Draw".

88-1 During the past several years I have had the privelege of watching the Elk herd increase in this area. Not only have the elk increased but also the moose population seems to be growing along with the bear. All of these animals, I and my family, have watched from the county road. In my opinion, more roads would only serve to drive the wildlife back farther and out of sight, not to mention the loss of wildlife due to poaching and Loss of habitat. In a time when we hear and talk so much about preserving wildlife & wildlife habitat, It seems senseless to push more roads, campgrounds and other access, back into these prime calving grounds for elk.

After we build these roads, which unrightfully takes land away from the land owners, and push the wildlife back out of sight, What then? Will we build more and more roads back until

RESPONSE TO COMMENT LETTER 88 (HOLMES)

88-1 Thank you for expressing your concerns. Please refer to our response 12-1 and 12-2.

88-1
Cont.

the wildlife has no place to go? This area is already riddled with enough roads. As it is, the beauty of this Area can be enjoyed from the county road which seems to be a safe distance from the animals. For those who are a little more ambitions and care to hike, There is plenty of access to these areas from the north & South ends of Jackson Draw.

In years past I have also witnessed the destruction of private + public lands by vehicles. Some People just don't care. Grassy meadows, fences, ponds and springs all have been deystroyed by those who don't care. Why should the private landowners have to suffer the loss and deystruction? Past experience proves that it cannot be stopped.

Please consider these thoughts and the opinions of others like myself befor taking anymore than we already have from the landowners and the Wildlife

Thank you for your time

Yours sincerly

Allan Hahne

3-15-92

Bureau of Land Management
Vernal District
attention Jean Sinclair

as a long time resident of Vernal Utah and one who has enjoyed the Mountains in our area, especially Diamond Mountain I have felt an urgency to Comment on the Diamond Mountain Resource Management plan and Environmental Impact Statement, particularly the area of Diamond Mountain known as Jackson Draw.

89-1 I feel that further Development of any kind in this area would not serve any truly useful purpose but instead be very Detrimental to wildlife habitat and Create a Situation impossible to Control for the land ownership involved.

there are several different species of wildlife that Can be observed from roads that are a safe Distance from where these animals feed, Calve in the Spring etc.

I feel the land owners have been more than fair in allowing hunters and others to Cross their land when permission to do so was requested.

If I Could See where there was a need for further Development of Roads, Campgrounds etc. in this area, and if I felt like no harm would Come to the wildlife that Can be Seen there, I would Surely Support the Management plan proposed. But as it is I would like to go on Record as being very much opposed to it. Please Consider my feelings here expressed.

Sincerely
Maureen Holmes
38525 1500 E
Vernal Utah 84078

RESPONSE TO COMMENT LETTER 89 (HOLMES)

89-1 Thank you for expressing your concerns. Please refer to our response 12-1 and 53-1.

RESPONSE TO COMMENT LETTER 90 (MOON LAKE ELECTRIC COMPANY, Winder)

MOON LAKE ELECTRIC ASSOCIATION • PO BOX 278 • 168 WEST 2ND NORTH • ROOSEVELT, UTAH 84066 • PH 722 2448

March 18, 1992

Penelope Smalley, Team Leader
BUREAU OF LAND MANAGEMENT
Vernal District
170 South 500 East
Vernal, Utah 84078

Subject: Comments Concerning the Draft Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement of November 1991

The Bureau of Land Management (BLM) has prepared a detailed document explaining the plans for management of the Diamond Mountain Resource area, and environmental impacts anticipated due to activities within the Resource area are outlined. We understand that this document now in draft form will eventually be modified into the final RMP/EIS which will guide the decisions made concerning the Resource Study lands administered by BLM in the future.

In general, Moon Lake Electric supports the recommendations of the Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS). The DRMP/EIS represents a very significant effort in defining existing uses, future issues, and probable environmental impacts which may be created by activities expected on BLM administered lands. Defining guidelines which will be used to help manage and resolve future issues is usually quite beneficial for everyone involved.

As a public utility serving a large part of the area within the Resource boundaries, we are very sensitive to impacts resulting from the BLM decisions regarding their administered lands in the following categories:

1. Developments which are allowed to occur within our service territory.

2. The regulations governing maintenance of existing power lines and rights of ways.

3. The regulations governing new extensions of power lines .

Being subject to the BLM regulations imposed upon us usually increases cost and introduces time delays for providing service to our members when BLM lands are involved compared to when they are not involved. We recognize that many of the regulations result from Congressional mandate, and do not originate within the BLM. When the reasons for added expenses are understood, reasonable, and affordable, we comply willingly to meet the requirements and accept the additional costs.

90-1 There is a proposal within the DRMP/EIS which causes us much concern however. This proposal is for the reintroduction of the Black-Footed Ferret in two (2) or less of several possible locations. We believe that the results anticipated and the impacts that are probable from such an action are unacceptable and therefore should be avoided. We question the wisdom of such activities in an area where, if the Black-footed ferret did once reside, conditions evidently changed to eliminate the species. Reintroduction of this endangered species into this area with all the related problems which will result does not seem like wise management. It could become a rather expensive experiment.

We note that the DRMP/EIS states that power lines would be required to avoid the Black-footed ferret reintroduction areas or they would need to be buried or designed to preclude raptors from using the power lines as hunting perches. While these alternatives are viable, the additional expense for a selected alternative can be significant. Who must bear such increases above normal expenses? We do not see the BLM statement that since this is in the interest of the citizens of the United States to reintroduce the Black-footed ferret, that BLM will help with the additional expenses to limit impacts such that alternatives remain cost neutral to those who would otherwise be directly impacted. We feel that should be one of the criteria used to recognize the costs of such a project, and that such expenses should be analyzed for costs and benefits.

We understand that the guidelines for management of this issue would allow some activities within the reintroduction areas. However, we do not feel that the complete facts are

90-1 The decision for the reintroduction of black-footed ferrets has been modified. Please refer to Table 2-15 for the proposed decision. The Endangered Species Act and subsequent Bureau policy and guidance directs DMRA "...to conserve ecosystems upon which endangered and threatened species depend." The act further states that: "...it is the purpose of congress that all Federal departments and agencies shall seek to conserve endangered and threatened species and shall utilize their authorities in furtherance of the purpose of this act." (Section 2(c)(1)).

We believe it is wise management to maintain species diversity which maintains ecosystem stability. Species diversity is a good indicator of the health of the individual habitats. The proposed reintroduction sites have been evaluated and the most recent information suggest the sites meet minimum USF&WS guidelines for the reintroduction of black-footed ferrets. These sites would need to maintain these qualities for two years prior to reintroduction to ensure suitable conditions exist at the time of release. All releases would be classified as "experimental nonessential" which allow the management flexibility to assure that black-footed ferrets will not significantly impact existing or future land uses on public lands.

All costs associated with powerline modifications to preclude raptors from perching on them within the black-footed ferret habitat would be paid by the company proposing the development. We believe that anti-perching structures provided on powerlines would not be a significant additional expense to the company proposed the powerline.

represented. We have had significant delays in projects introduced because of the timing of projects in areas suspected as the habitat for Black-footed ferrets on BLM administered lands. Such delays have affected us in that we could not even survey for power line centerlines during certain times of the year, and the timing of construction was limited to only a few months of the year. We have had to pay for studies about ferrets which were done by expensive consultants without any benefits to show for the studies other than the fact that no Black-footed ferrets were observed. We have had customers that have experienced worse problems than we have because of overzealous concern for the Black-footed ferret. We fear that the possible failure of the experiment to establish the Black-footed ferret could result in similar impacts as above for many, many years.

The areas for reintroduction of the Black-footed ferret are not confined to small parcels of land. The areas cover rather significant amounts of land. This land will have limited activities immediately when the final RMP/EIS is approved even prior to when the ferret is reintroduced. This has the effect of limiting resource development which may not be in the best interest of the United States or its citizens.

We urge the BLM to reconsider the reintroduction of the Black-footed ferret into this area, and to eliminate this proposal from the final RMP/EIS.

Sincerely,

Kenneth A. Winder

Kenneth A. Winder
Manager - Engineering

March 29, 1992

Dear BLM:

Of the various alternatives in the Diamond Mountain RMP, **I support Alternative B**. For too long, the BLM has ignored an ecological systems approach to land management. You quote Aldo Leopold at the beginning of the RMP, but show little understanding of what he stood for. For example, while the RMP goes on at length about economics, it says virtually nothing about biodiversity. The long term health of the land and of the life on it should be your #1 priority. Alternative B comes closest to managing for these values. 91-1

If you choose your preferred alternative, "E," please incorporate into it the modifications proposed by the Uintah Mountain Club, which provide a bare minimum standard for wise land use.

Regardless of which alternative you chose, please designate *all* of Red Mountain as an ACEC and as a *semi-primitive nonmotorized area*, under *level 1 management* with a VRM class 1 designation. It does in fact meet the criteria. From my reading of the RMP, you seem to understand the values of the upper part of the mountain, but you've completely overlooked **the lower part of the mountain which includes the slickrock areas from the arch across to the pinnacles and fins. This is a spectacularly beautiful area, the prettiest in the basin, and one of the most fragile.** It has a riparian area, geologic formations to rival southern Utah's, forage for wildlife, petroglyphs, and an abundance of cryptogamic soils being torn up by OHVs, resulting in a lot of erosion. Please note that **it is essential that you acquire state sections 16 and 2**, especially section 16. The mountain should also be closed to mountain bikes and to rock climbers placing fixed (permanent) protection. 91-2

I also hope to see more protection for the Browns Park area, the reintroduction of ferrets into the resource area, Wild and Scenic Status for the Green River, and a **very much stronger emphasis on identifying and protecting the habitats of existing endangered species.** You know you could have some on Red Mountain. Shouldn't you check it out before risking getting into hot water and having to do an expensive and painful recovery project because you let the ORV people buffalo you into giving them access anywhere? Finally, I really revile bear baiting. You should make hunters on public lands get off their butts and be sportsmen by banning bear baiting, and for that matter, hounding as well. 91-3

Thanks for your consideration.

Nicki Wake

Nicki Wake
848 W. 400 S.
Vernal, Ut 84078

RESPONSE TO COMMENT LETTER 91 (WAKE)

91-1 We agree with your concern regarding the long-term health of the land and the life dependent upon it being our number 1 priority. However we must disagree with you on the matter of biodiversity. Although the term "biodiversity" is consciously not used, the terms "species diversity" and "vegetation diversity" are used throughout this document in their proper context, which incorporates the concept of biodiversity. We believe a general definition of biodiversity (now included in the glossary) has in fact been followed from the outset. An interdisciplinary team of specialists developed the documents; representing the resource values and programs effecting the nonliving and living (including human) components of the ecosystems within the resource area. These specialists forged alternative plans and decisions with the overriding awareness of and concern for the inherent dependence and interconnectedness of these ecosystems' parts.

91-2 Thank you for your comment. Please refer to our responses 79-2 and 12-1.

91-3 It is recommended in the proposed plan that the Browns Park area be managed as an ACEC. Management prescriptions for this area are contained in Table 2-18. It is also proposed to reintroduce black-footed ferrets on one suitable site, as well as ending the issuance of bear baiting permits on public land. All of the alternatives in the RMP would protect the habitat of existing endangered species, but we believe the best emphasis is stated in the proposed plan. We concur with your statement concerning the need to identify special status animal species habitat. We currently show no endangered or threatened species utilizing habitat on Red Mountain. We continue to update our data with new inventories and will continue to monitor the known habitat to ensure protection is maintained.

THE WILDERNESS SOCIETY

CENTRAL ROCKIES REGION

March 25, 1992

Jean Nitsche-Sinclear
Vernal District BLM
170 South 500 East
Vernal, UT 84078

Re: Diamond Mountain Resource Management Plan DEIS

Jean Nitsche-Sinclear:

The Wilderness Society is a non-profit conservation organization dedicated to the preservation and wise management of America's public lands and natural resources. We have approximately 2000 members in Utah, and 136,000 nationwide. All our member value and benefit from the public resources on the Vernal District and Diamond Mountain.

The Wilderness Society Supports Alternative B

This alternative would not only enhance natural values but provide setting in which long term, sustainable economic development could be enjoyed by the local population. Livestock grazing would remain at present preference unless reductions are indicated. Surface occupancy mineral activities would be allowed on nearly half of the entire resource area with no surface occupancy mineral activity allowed on the entire balance. Seventy-eight percent of the resource area would remain open to off-highway vehicle use. Riparian areas and watershed would be protected. This alternative serves the greatest public interest with the exception of unnecessarily restricted access. Alternative E's access guidelines are more appropriate.

92-1 It is essential that mineral development not be allowed in critical or crucial wildlife habitat, sensitive watersheds areas, or in areas of high scenic value. The short term economic gains from extraction could only be gained by the loss of these other

Utah Office
Walker Center • 175 So. Main Street • Salt Lake City, Utah 84111
(801) 355-4742 • FAX (801) 575-5202

RESPONSE TO COMMENT LETTER 92 (WILDERNESS SOCIETY, Leeson)

92-1 Management prescriptions outlined in the proposed plan will provide adequate protection for crucial wildlife habitat, sensitive watershed areas and areas of high scenic value either through mitigation measures or avoidance.

92-1 Cont. values which themselves have not only ecological and recreation value, but economic values of their own. It is essential that phosphate mining, for example, be disallowed in these areas.

92-2 The scenic and recreation values of the slickrock country north of Steinaker deserve greater protection. This area should be managed specifically to protect and facilitate non-mechanized recreation opportunities.

92-3 The DEIS has failed to provide sufficient protection for the unique paleontological and archeological resources in the resource area. The final plan should include management prescriptions for protection.

92-4 In the event that the two WSAs are not designated wilderness, the RMP should provide for ACEC designation.

Why Do the Other Alternatives Not Serve the Public Interest?

92-5 Alternatives C and D are serious departures from multiple-use, sustained yield management objectives. It is appalling that these alternatives ignored so many management imperatives. They violate FLPMA, violate the agency's own Riparian-Wetlands Initiative, and all but ignore non-discretionary protection of wildlife and listed species critical habitat.

Rivers Protection

92-6 It is important that both the Upper and Lower Green River be protect under the Wild and Scenic Rivers Act.

Grazing

92-7 The DEIS has utterly failed to justify continued grazing on any of the allotments that are in less than good condition. Only 28 allotments in the entire resource area are in satisfactory condition. All of the other allotments have or may have conflicts with other resources. Keeping these allotments in the suitable grazing land base is questionable and should have been analyzed. Even Alternative B fails to adequately protect wildlife habitat, plant communities and watersheds from the negative impacts of livestock grazing.

92-8 The rangeland projects briefly described include many vegetation conversions but provide no description or discussion or justification for such conversions. It is unacceptable that the final plan would authorize, even at the programmatic level, such plant community changes without full disucssion of the need and impacts.

92-9 Nineteen riparian areas are in unsatisfactory condition yet these areas have not been removed from suitable grazing land base.

I appreciate the opportunity to participate in this important planning process.

Sincerely,

Jane Leeson

Jane Leeson

92-2 Thank you for your comment. Please refer to our response 12-1.

92-3 The section on paleontological resource has been revised. Please refer to the responses provided to 82-13 through 82-17. It is our opinion that archeological resources have been addressed adequately in the plan. Federal law mandates protection of cultural resources.

92-4 Please refer to our response 77-5.

92-5 BLM believes Alternatives C and D are consistent with the laws, regulations, and policy guidelines governing management of public lands refer to the planning criteria outlined in Chapter 1. As stated in Chapter 2: "Each alternative is a complete, reasonable, and implementable resource management plan, in which the different management practices are described, and the different ways of achieving balanced resource management under different management priorities are discussed."

92-6 Thank you for your support. The recommendation to designate both the Upper and Lower Green River for inclusion in the Wild and Scenic River System has been continued into the proposed plan.

92-7 You are referred to Appendix Table A8-6. There are 94 allotments designated in satisfactory range condition; 14 in unsatisfactory condition. The categories are a general overall determination of vegetation health on an allotment. Although an allotment may have been placed in satisfactory condition, it may contain localized resource-specific problems or concerns. The high number of "I" allotments or "Improve" category is due primarily to high wildlife habitat potential or riparian improvement needed (please see Appendix 8 for a description of the allotment categorization process).

92-8 Grazing can be managed for improvement of vegetation resources. Refer to Chapter 2 under vegetation resources in the management common to the proposed plan and all alternatives, relating to livestock grazing as one of many vegetation treatments to achieve improvements to resources or a desired ecological stage or plant community. We believe ecosystems are adequately protected from livestock grazing where permitted in all alternatives. Please refer to Chapter 2 Management Guidance Common to the Proposed Plan and all the Alternatives, livestock section.

92-9 As stated in Table 2-15 under riparian in the proposed plan, riparian improvement will be accomplished by rangeland improvements and grazing systems designed to enhance riparian areas. Livestock grazing would be discontinued on riparian areas that do not respond to improved grazing management.

Uintah Special Service District
P.O. Box 144
Vernal, Utah 84078
(801) 789-4636

Mar.26,1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal Utah 84078

Comments on DRAFT EIS Diamond Mountain Resource Area RMP.

96-1 1. The Diamond Mountain Resource Area Plan should consider existing county roads in all Public Lands decisions.
A. Page 1.10 under RIGHTS-OF-WAY fails to consider the existing RS 2477 rights-of-way established by Uintah County, including roads BLM has previously recognized. For example there is an agreement signed by BLM District Manager,and State Director and the Uintah County Commissioners in 1981 acknowledging RS 2477 rights-of-way within the County and District. I can find no mention or reference to those rights-of-way.
B. Page 3.20 ACCESS AND ROADS states that roads are maintained by the county, but fails to acknowledge the existence of the numerous RS 2477 County roads within the Resource Area.

96-2 2. Page 3.69 Table 3-25, Russian Olive and Halogeton should be added to the undesirable plant species occurring within the RA because of their impact or possible impact on Public Lands.

Thom Wardell
Manager

"Moving the Basin Ahead"

RESPONSE TO PUBLIC COMMENT 96 (UINTAH SPECIAL SERVICE DISTRICT, Wardell)

96-1 The issue of county RS 2477 rights-of-way is an administrative matter. When implementing the land use decisions we will make an administrative determination as to the effect of the decision on the status of such roads.

96-2 Thank you for your information. Halogeton is discussed in Chapter 3 as a noxious and poisonous plant. We recognize Russian olive to be a county-noxious weed. We have added both to the list in Chapter 3.

11504 86TH AVE CT SW
TACOMA WA 98498
March 25, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal UT 84078

Regarding: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production

Dear Ms Smalley,

97-1 We are opposed to any development in the Mane's Hole and Bear Hollow areas of the Jackson Draw. A road would destroy the remote beauty of these places, erode the mountain side and require the cutting of evergreen and aspen trees that have stood untouched for centuries. The wildlife would be displaced by the intrusion of humans into their environment.

Do not destroy our children's and grandchildren's children opportuny to see a part of the Old West as it has been for many years. The building of roads is not the best use of the mountain peaks in Jackson Draw. There are roads all over the Uintah Mountains among the downed timber. Please preserve the land as it is for future generations.

Sincerely yours,

Delilah & David Badger

Delilah and David Badger

RESPONSE TO COMMENT LETTER 97 (BADGER)

97-1 Thank you for expressing your concerns. Please refer to our responses 12-1 and 53-1.

111 South 200 West
Springville UT 84663
March 23, 1992

Jean Sinclear
Bureau of Land Management
Vernal District
170 South 500 East
Vernal UT 84078

Dear Ms Smalley,

Regarding: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production

100-1 The building of roads into Mame's Hole/Bear Hollow areas is not the best use of these quiet wildlife inhabited mountain areas. Please leave us some areas to show our children and grand children and great grandchildren that are not criss crossed with roads that have required the cutting of trees and the destroying of the mountain sides.

We are opposed to any development of the Mame's Hole/Bear Hollow and Jackson Draw areas.

Sincerely yours,
Debbie, Scott Storie
Debbie and Scott Storie

RESPONSE TO COMMENT LETTER 100 (STORIE)

100-1 Thank you for expressing your concerns. Please refer to our responses 12-1 and 53-1.

6047 S Redwood RD
Salt Lake City UT
March 23, 1992

Jean Sinclear
Bureau of Land Management
Vernal District
170 South 500 East
Vernal UT 84078

Regarding: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production

101-1 We are opposed to any access or campground into the Mame's Hole-Bear Hollow and Jackson Draw area. This area should not be disturbed but preserved in its remote primiative state.

These areas should not be destroy by buildings new roads up the sides and over the tops of the hills. When I travel in Jackson Draw I feel that if I watch carefully I could meet up with a cowboy on a horse at any moment, who might be one of the outlaws who road this way so many years ago.

Sincerely yours,

David + Stacy Ely

David and Stacy Ely

RESPONSE TO COMMENT LETTER 101 (ELY)

101-1 Thank you for expressing your concerns. Please refer to our responses 12-1 and 53-1.

1624 South 1000 West
Vernal, Utah 84078
March 25, 1992

Jean Sinclair, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Sinclair,

102-1 I am very concerned about the resource management plan for Diamond Mountain. Proposals A, B, C and D seem to be loaded to the desires of special interest groups. Short term profits and improper use of fragile land is not in the best interests of the people of Utah. The Federal Government and the State of Utah need to consider the alternative which will best benefit the majority of citizens. This choice should be Alternative E. It is the most sensible management plan. Our fragile desert environment needs to be protected, therefore I must also concur with the Uintah Mountain Club's proposals for the improvement of Alternative E.

Our delicate must be carefully protected, we cannot afford to error in the management of precious natural resources. Please consider the tremendous potential for long term environmental destruction the other proposals would allow. Please adopt E with the changes put forward by the Mountain Club.

Sincerely,

Steve Kreek

Steve Kreek

RESPONSE TO COMMENT LETTER 102 (KREEK)

102-1 Thank you for your comments.

Land is an organism. When we see land as a community to which we belong, we may begin to use it with love and respect.

There is no other way for land to survive the impact of mechanized man.

Aldo Leopold

UINTAH MOUNTAIN CLUB • P.O. Box 782 • Vernal, Utah 84078

March 23, 1992

Team Leader Jean Sinclair
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Sinclair,

Let me express my hardy support for the general principles outlined in Alternative E of the Draft Diamond Mountain Resource Management Plan. Alternative E truly goes a long ways towards addressing the competing needs and desires of various interest groups. However, while Alternative E is a bold step in the right direction, there are some weak points which need correction before its adoption as the final RMP. The Natural Resources Committee of the Uintah Mountain Club will be sending you a detailed list of specific wording and paragraph corrections we would like to see. In this letter I wish to highlight some of the more general issues which need to be addressed in the final RMP.

In terms of overall goals, we would like to see the BLM move toward a greater balance between conflicting uses. We need a truly workable multiple-use philosophy, which takes into account both non-consumptive and consumptive uses. Ecological preservation and recreational uses of the land need to have an equal footing with income and employment generation. Multiple-use should mean various, separate lands being set aside for different uses. Quiet and solitude oriented recreation cannot co-exist on the same acreage open to motorcycles and ATV's. Grazing and primitive, backcountry camping do not go well together. It is imperative that the BLM designate and reserve lands to meet the needs of all of the different people wishing to use them.

103-1 With the above comments in mind, I ask the BLM to address the inequities expressed in Table 2-2 "Management Priority Areas by Alternative" page 2.16. I do not see much balance between competing land uses when proposals A, C and D call for zero acres of Level 1

RESPONSE TO COMMENT LETTER 103 (UINTAH MOUNTAIN CLUB, Borton)

103-1 Please refer to our response 61-1. Using this concept, an even progression of level acreages between the alternatives and the proposed plan did not develop.

land. Even proposal E with 6,100 acres of Level 1 appears to be an unfair compromise, when compared to the 113,000 acres of Level 1 land called for under B. Even at Level 2 protection levels, proposal E with 9% is not an adequate compromise between the 1% of C and the 42% of B. While many of the specific proposals of plan E are fine, in terms of the overall balance between competing land use philosophies and needs, far too little acreage is sufficiently protected. In terms
103-1 of Level 1 and 2 Management Priority Areas, I would like to see a
Cont. compromise between the acreage figures of proposals B and E. Specific areas deserving special protection will be dealt with below, but in terms of the general overall balance of land use options, this question of total acres under level 1 and 2 status needs to be addressed by the BLM. More areas with unique and important non-commercial resources should receive level 1 and 2 management prescriptions. This should include paleontological and archaeological sites, vital wildlife habitat, riparian areas and lands of scenic and recreational importance.

Even though Alternative E calls for designation of 5 Areas of Critical Environmental Concern, not enough land is protected. In particular, the slickrock country north of Steinaker deserves protection. Here we have a ten-square-mile section of some of the most scenic country around. This is an excellent area for hiking, photography and other non-motorized forms of recreation. Furthermore the area includes relic vegetative communities and cryptogramic soils
103-2 in need of protection. In the last two years, the area around Moonshine Arch has suffered vandalism and trashing, while ORVs have extended trails into previously untrailed areas to the detriment of the existing vegetation. Most of this area should be preserved for primitive and semi-primitive, non-motorized recreation. The motorized travel to the Arch should continue to be banned, the ban expanded to the surrounding area, and the ban enforced with ticketing of offenders. The BLM should also acquire adjoining private lands and State Section 16 in the Red Mountain Area so as to better manage and protect the area.

Other areas in need of attention are the Diamond Break's and West Cold Springs WSAs. Should they not receive wilderness status from Congress, they still deserve to be part of the Brown's Park ACEC. Both the Upper and Lower Green River should be granted Wild and Scenic
103-3 Status. Equally important is the closing of sage grouse leks and raptor nesting sites to OHV use or other surface-disturbing activities. Maximum protection should be given all threatened, endangered and special status species. The Mountain Club strongly supports all efforts to reintroduce bighorn sheep, river otters and black-footed ferrets. However, we oppose phosphate mining in the Red Mountain / Ashley Creek area as this is critical/crucial winter range for deer and elk. The draft RMP fails to offer any differences in the
103-4 alternatives offered on this issue. Furthermore, it is important to establish protective zones around archaeological and paleontological sites. Such lands should also restrict ORV and other surface disturbing activities.

103-2 Thank you for your concerns. Please refer to our response 70-1.

103-3 Please refer to our response 77-5.

103-4 Regarding your concern of phosphate mining in the Dry Fork area, please refer to our response 61-2. We do not believe it is necessary to establish buffer zones around archeological and paleontological sites. We are however expanding Map 3-3 to identify additional sensitive paleontological areas brought to our attention during review of the draft RMP. Refer to Chapter 2 for a comparative description of how these resources will be managed between the proposed plan and the alternatives.

103-5 The only other major problems with the plan I see is the failure to adequately deal with the need for future restrictions on mountain bike use and your labeling of social categories. Mountain bike use is growing rapidly and needs to be addressed. In Chapter 4 your designation of social categories is bothersome. Your terms of "workers" and "young newcomer" seem to distort the facts. Mountain Club members range in age from diapers to retirees. Many were born here, while others have lived here for many years. All hold jobs, many in professional fields, and work very hard in support of their community. Less divisive terms should be found for naming these categories.

We are pleased with the new emphasis the BLM is placing on riparian areas, Wild and Scenic River designation, and the reintroduction of indigenous species. We approve of the BLM commitment to improvement of rangelands, preservation of scenic areas, enhancement of recreational values, protection of wildlife habitat, and the designation of 5 Areas of Critical Environmental Concern. This draft RMP is a grand step forward. Alternative E is a good beginning. With the changes the Mountain Club is proposing it can be a great alternative suitable for meeting the many diverse needs of the community and the land.

Sincerely,

Stephen Borton
President

103-5 Mountain biking is a legitimate use of public lands. Currently in the Diamond Mountain Resource Area there are no problems identified with this use. It is expected that if problems develop it will be in areas that receive heavy recreation use such as Red Mountain and Browns Park. Mountain biking along with other uses will be addressed when recreation management plans are prepared or revised for these areas. All discussion to the "social categories" have been removed from the proposed plan/final EIS.

Allan E Smith
Box 153
Duchesne, Ut 84021

March 24, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Ut 84078

Response to Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

General Comment:

I am a third generation rancher and my family has been using my allotment before and since the inception of the BLM through the Taylor Grazing act of 1934. Any decesion by BLM affects my livelihood and the economic base of all the counties of Utah in which I do business.

Under the section"Purpose and need I pg. 1.1 the principal of "Multiple-use is referred to and its principals are to be followed in management. I can congure with this policy in total. This policy of Multiple-use is mandated by law and can not be changed by simple in house policy. The" Memorandium of Understanding " between Ut. Dept of Ag. and the Ut State Director of the BLM signed on 6/21/88 provides for State involmement in this EIS. The Uintah County Commission adopted a similar ordinance incorparating the "MOU" on 11/5/91 and the Duchesne County Commission iscdnsidering such an ordinance.

104-1 In general these ordainances and "MOU" state that where the economic base and cultural value of its area are affected the Utah Dept of Ag. and County Commissioners must be made a part of any decision making process. Futher the public range lands Improvement act of Oct.25,'78 ensures full participation of the permittee(s) and UDA in the planning process if requested and agreed to by the permittee.

I as a permittee am requesting such permission to pafticipate in any planning process and I am requesting my present and future comments be made a part of the record reqarding this DEIS.

I am also asking our Duchesne County Commissioners and Uintah County commissioners to be involved in as much as they are charged by law to protect the economic base of their counties.

104-2 Any decesion made by the Vernal District BLM that may adversely affect my allotment on the BLM will inturn affect my total operation and in turn any tax base that I may provide. I want it noted that the econonic multilper of Agriculture in the State of Utah is between 3 and 4 and is much higher than other industries. For example for every dollar I spend as a rancher is multiplied 3 to 4 times. I spend most of my money in the rual part of Utah and in turn this money helps keep rual Utah alive. Eastern Utah gets most of its revenues fron agriculture and oil. These industries must be protected at all costs.

104-3 Under"Cumulative Impacts of Implementing Alternative E paragraph # 7 states: Cululative increased wildlife use from 27,600 AUM's to 40,000 AUM's could result in livestock reductions(9,000 AUM's) which amy result in a $11,500 yearly loss to the local livestock industry. However, this increase may also generate up to $94,300 for the local community from lodging, food and transportation costs paid by the hunters and recreationists" These figures I challenge.

RESPONSE TO COMMENT LETTER 104 (SMITH)

104-1 Thank you for your comment. Be assured that BLM has seriously sought the input of the State of Utah, Duchesne and Uintah County Commissions, as well as DMRA grazing permittees throughout the development of this RMP. Please refer to the State of Utah's comment letter (114), the Duchesne County Commissioners (36) and Uintah County Commissioners (110) comment letters as well as our specific responses.

104-2 Please refer to our response 69-2.

104-3 The 9,000 AUM reduction was printed in error. We believe livestock preference will be met under the proposed plan. Please refer to our response 52-2.

2

There should not be any reduction of livestock Aums in favor of wildlife. Any reductions need to be made on scientific evidence based upon the resources.

104-4 The 31% increase of wildlife can not stand and alternative E must be changed to illiminate this large increase.

This EIS is stating that wildlife Aums are 8.24 times more important than the livestock aums. I can not accept these figures. The $1.27 value of a livestock Aum is in error and should be $ about $9.19. From what expert did the $94,800 increase come from?

Page 4.65 Table 4-18 Summary

Alternative C states present levels of Big game at 27,600 Aums. Can the BLM show scientific data to support these figures. My opinion is that the present big game aum levels are now more at the proposed levels in Alternative E, 40,000 Aums.

The BLM has not sufficient population counts to support their proposals. The BLM has relied upon DWR's population count and I believe DWR's data to

104-5 be in favor of DWR's whims. I believe more range studies such as we have done in Big Wash Draw are necessary to document forage use by domestic livestock and big game. The pellot counts and utilization studies are the best method to document populations.

I understand big game levels on a Unit wide basis may be in line but some areas are receiving more than their percentage big game usage. This non uniform grazing by big game must be addressed.

Page 4.65 of the Summary of Impacts of livestock assignments.

Alternative A states forage assignments coud be given to livestock on a temporary, non-renewable basis until needed by wildlife. This is not my understanding of the present management system. During the 1960's when live-

104-6 stock levels were reduced by permittes it was agrered that any increase of forage would be given 50% to livestock and 50% to wildlife. If this EIS is ever challenged in the court system, I believe that the BLM authors of this DEIS could be held accountable for their miss statements regarding how forage is presently allocated. The 50% allocation needs to be in writing and not hiden from all concerned.

The only way I could live with a new EIS is that alternnative E if accepted continue the present formula for forage allocation..

This is the end of general remarks and I will now address those concerns of mine with my present cattle allotment in the Big Wash Draw. My 5 year average use is low because I have just recently changed from a sheep operation to a cow operation plus the drought of recent years has influenced my running

104-7 lower numbers than my preference calls for. The statement of page A 2.4 273 wildlife Aums and cow aums of 290 equal 563 pr esent use does not ncessarly represent what our pellot and utilization studies show. I believe gig game usuage show more like 65% of the feed utilized. The BLM office has the actual records and it should show what is actually going on. I can agree at the total aums present (1,332) as stated on page 2.4 but I can not accept a reduction of my preference to accomidate the proposed wildlife objectives

104-4 Please refer to our response 53-3 regarding wildlife and livestock forage allocations, and the socioeconomic assumptions in Chapter 4.

104-5 The 27,600 AUM forage assignment for Alternative C is based on UDWR's annual surveys. We recognize UDWR as the expert on wildlife management within Utah and accept their use levels. We currently have 30 pellet transects in place on crucial areas throughout the resource area and have plans for additional studies. We recognize that both livestock and wildlife prefer certain areas and as a result "nonuniform" grazing occurs throughout the resource area. We have always attempted to even out this use through water developments and forage enhancement project work.

104-6 As part of Table 2-15, under Alternative A, additional AUM distributions to livestock and wildlife are stated in agreement with the decisions in existing planning documents. In the Ashley-Duchesne areas, forage increases would be divided equally between livestock and big game on non-crucial areas. If this forage were not needed by big game, it would be given to livestock.

104-7 Monitoring studies on Big Wash Draw Allotment indicate a total of 1,141 AUMs are presently available to livestock and wildlife, refer to Table A2-1, in Appendix 2. Currently, there appears to be sufficient AUMs on the allotment to accommodate existing livestock preference and objective levels for wildlife.

104-8 The population of elk using Big Wash Draw allotment is now much higher than this BLM DEIS statement is now showing.. I believe that the ob ective wildlife level is already now achieved. We can not accept DWR/s count only but must use all ~~b~~ our tools available. The DWR has used the Elk Management Plan which has been in the process for at least 10 years to achieve its desired elk levels. While this plan has been in development the elk numbers have increased by leaps and bounds. ust because the whole elk unit may not be at DWR's desired level is not a concern of mine but if Big Wash Braw allotment is at its objective level then any future increase of wildlife will have to delt with by me, BLM and DWR.

104-9 As for the 82 Aums gained for wildlife I Have the following comments:
First the contor disking and seeding this past fall of 1991 in Big Wash Draw is not an increase of aums but it simply replaces what was done in the early 1960's. The old seeding project quit providing the quality of forage it used too. I believe the main reason was the flood action silted over the seeded land, thus stoping water infiltration and normal plant growth.
Secondly, Steve Strong,BLM range Con. contacted me last year and asked if I would contribute seed to the proposed seeding project in Big Wash. I stated I would if DWR would also contribute some seed. I waS NOT TOLD THAT any future increase in Aums would go soley to wildlife. This DEIS has been in the process for quite a long time. It is my contention that my contribution of some 400 lb. of seed at a cost to be of $1,000 was received by the BLM under false pretences. Either I receive half of the increase from this seeding project if it is actually an increase or I receive all of the benifits if it simpley replaces what was one there. The proposed DEIS is not yet final and we must allocate forage under the present system of 50% for livestock and 50% for wildlife.

104-10 I have in the past objected to BLM personel both in writing and verbally that I oppose BLM's policy of creating a year around habitat for elk on this BLM range by making water ponds for wildlife. The Big Wash Draw is a winter range. BLM must be held accountable for its creation of watering ponds. I can not agree that the ponds are only for erosion control. After one or two years from now if the four ponds made in the fall of '91 are not filled up with sedement I will ask the BLM to fill them. This range can not tolerate elk using it all though the growing season. of March through June. My cows leave this allotment the First of March thus alowing for new growth to become established

104-11 I appreciate BLM and DWR personal working with me on the Big Wash Draw allotment. We should continue to work to gether and have constructive dialoge. I intend to be a good steward of the range so that my future use of this range will continue. Protection of the range resources should be the number 1 goal of all of us. I have reduced my livestock numbers in drought years and I am willing to continue to work for better range conditions.

Sincerely

Allan E Smith

Allan E Smith

104-8 In 1986 we established pellet group transects in cooperation and coordination with you and UDWR as a means of monitoring livestock and wildlife use. We continue to monitor the utilization on vegetation and will use this data as the key factor in determining eventual stocking levels. Vegetation improvement work also continues on the Big Wash allotment with 150 acres of old grass seedings replanted in 1991 and 400 acres of pinyon and juniper trees planned for firewood harvest in the future (refer to Appendix 8). The Anthro-Argyle elk herd management plan will be scheduled for completion in 1994 in accordance with State of Utah priorities. We look forward to working with you and UDWR to resolve objective and wildlife-livestock concerns.

104-9 The RMP was not in effect when the plowing and seeding project was completed in 1991 on Big Wash Draw Allotment. The project was completed, as you indicated, to improve existing production to post-treatment productivity, or in other words, to maintain the project viability providing forage for livestock and wildlife. UDWR contributed half the seed to provide for increasing elk use in the area. Until the proposed RMP is approved, any increases in forage will be allocated under the direction of the current planning document.

104-10 Please refer to our response 104-8 above. We believe with normal precipitation some spring elk use on the grass is not detrimental. Our management objectives have been to increase forage production for both livestock and wildlife through habitat improvement projects and to improve elk distribution by developing new water sources. The data collected to date indicate that these objectives are viable under good range management principles.

104-11 Thank you for your comment.

P O Box 6306
USAFA CO 80841-6306
March 23, 1992

Jean Sinclear
Bureau of Land Management
Vernal District
170 South 500 East
Vernal UT 84078

Regarding: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production with limitations.

105-1 I am opposed to the development of any roads or campgrounds in the Mame's Hole - Bear Hollow area. There is not a road into this area and it should be left that way. We need to have some areas of this country left untouched by the hand of man. Roads will destroy the natural habitat of the wildlife and animals that live in those mountain meadow environments.

Sincerely,

Daniel J Ely

Cadet Daniel J. Ely
United States Air Force Acedemy

RESPONSE TO COMMENT LETTER 105 (ELY)

105-1 Thank you for expressing your concerns. Please refer to our responses12-1 and 53-1.

A. Rex Gardner
18402 Augusta Drive
Monument, CO 80132
March 25, 1992

Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

ATTN: Penelope Smalley
Team Leader

RE: Diamond Mountain Resource
Area - Resource Management
Plan and Environmental
Impact Statement

Dear Ms. Smalley:

Recently it was brought to my attention that your office, United States Department of the Interior Bureau of Land Management, November, 1991, released for puvlic comment a detailed report in a large book, Diamond Mountain Resources Area RMP/EIS (Draft).

After obtaining a copy of your above mentioned report and a serious attempt to comprehend the purpose and intent, referenced, (acquire needed public vehicle access for recreational purposes).

I am submitting my comments from Florida and I do not have my records with me for exact dates and in the essence of time I shall make my statements with dates approximately.

In the 70's, Alvin Kay, Glenn Cooper, and myself purchased 5,149 acres of Fee property called the Warren Draw, and purchased under the name of Gardner, Cooper, and Kay, G.C.K., and shortly after the purchase we, G.C.K. was contacted by the Department of Wildlife Resources and B.L.M., to sell the G.C.K. properties to replace deprived wildlife habitat that was taken by the building of Flaming Gorge Dam. G.C.K. agreed to sell only 2,400 acres and Alvin Kay and myself decided to keep the North 1600 approximately acres and continue to use in conjunction with B.L.M. and State of Utah grazing A.U.M's.

The 2,400 acres became a public use area and the old original Patented Properties Cabins, fences, and corrals have been burned by deer hunters and four wheel drive vehicles have roads where they should not be; the deer and elk are scarcely seen in these areas now.

To: Penelope Smalley
From: A. Rex Gardner
Date: March 25, 1992
Page two

The remaining 1,600 acres is unique, in that the only way to continue access to the North end of the Warren Draw would be to cut a road in the center of the long sliver of private property, seriously dividing the grazing and requiring fencing. After public access is acquired by this approach, it would only accommodate a short distance and a turn-around for the North end has a steep drop to the Green River below.

There is no public fishing in the Warren Draw and the public is now not deprived of foot traffic or horseback hunting and I see no point in destroying our privacy of our existing cabin and grazing for this small distance to accommodate a road that cannot be used for any purpose other than a turn-around.

106-1 I am not in favor of this invasion of additional access for public use in the area of i.e., Warren Draw, Jackson Draw, Lambson Draw, and Ashley Creek. Ranchers are struggling to survive as is, and wildlife is also being threatened by this proposal.

Sincerely,

A. Rex Gardner

A. Rex Gardner

RESPONSE TO COMMENT LETTER 106 (GARDNER)

106-1 Please refer to our response 12-1.

March.28,1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

To Whom It May Concern:

As the livestock permittee on the Bridgeport allotment, we appreciate the opportunity to comment on the Draft Environmental Impact Statement for the Diamond Mountain Resource Area Resource Management Plan. Our season of use on this allotment is April 1t - May 15. For the past 15 years with the agreement of Bureau of Land Management we have grazed more numbers with a shorter season of use. This is actually a better grazing system for the vegetation, due to better distribution throughout the allotment with light use occurring on the majority of the allotment. We are out of the allotment early enough in the growing season to allow vegetation to achieve significant growth and set seed. This leaves more vegetation for wildlife use in winter.

We have been working with the Soil Conservation Service to improve our private land. It seems contradictory that one government agency wants to see improvement to help the livestock industry and another wants to hinder it's very existence.

107-1 We agree with your comments that high overhead costs and taxes have caused several ranchers to sell, and nontraditional owners buy these properties. It would seem to be of value to all involved for you to support the traditional ranchers who are very

RESPONSE TO COMMENT LETTER 107 (RADOSEVICH)

107-1 Thank you for your comment. BLM also believes there are great benefits to ranchers and wildlife managers working together to achieve resource goals while maintaining or improving the quality of life.

much aware of the lands around them and know they can not abuse these lands and still make a living. Also most traditional ranchers we know enjoy seeing wildlife, and would do all they could to help improve wildlife habitat, to help compensate for the amount of forage that wildlife consume on their private

107-1 property. The only time ranchers don't enjoy seeing wildlife is when they are consuming valuable forage and the rancher is not being compensated for this loss. We can see benefits to ranchers and wildlife managers in working together to preserve both our way of life and the wildlife habitat.

The following comments pertain to the Browns Park area and the Bridgeport allotment, since management changes in this area would affect us.

Wildlife

What about impacts by wildlife to the private land owner? According to our counts this past year, on our private ground,

107-2 there was in excess of 300 head of deer, 60 head of elk, 15 head of antelope and uncountable numbers of geese.

In reference to statement A8.18 #3, if this statement is true, then wildlife numbers should not be increased . If the forage can not support an increase, then you can't put it there.

We feel there is little or no conflict for vegetation be-

107-3 tween deer and livestock the time of the year that livestock are grazed on the Bridgeport allotment. Studies have shown that most competition between deer and livestock is behavioral and occurs when competing for forage on summer ranges. (John G. Kie ETAL.USFS,Pacific South West Research Station) We are not trying

107-2 Please refer to our response 12-2.

107-3 In the draft RMP, Bridgeport was shown as having a forage availability problem in error. Table A8-3 has been corrected accordingly. You are correct, if the forage cannot support an increase in use, BLM will not advocate an increase. We agree, spring livestock grazing in Browns Park is beneficial to maintain deer winter range.

to discourage wildlife, just the exclusion of livestock. According to a recent study by Richard Decker and David Pyke, of Utah State University, cattle grazing can be beneficial to sagebrush growth, which supports the deer herds in Browns Park in the winter. There is no competition between livestock and deer for this winter forage.

107-3 Cont.

Any range improvements made would be beneficial to wildlife and livestock and should be encouraged. We are willing to improve our allotment and have offered to use our equipment, fuel and labor to pull a rangeland drill to improve forage.

Table A2-1 talks of increasing antelope use by 5 AUMS, elk by 92 AUMS, moose by 5 AUMS and bighorn sheep by 25 AUMS. It seems that Division of Wildlife Resources can not manage the current number of wildlife efficiently, we feel the numbers they have counted for this area are low. Increasing wildlife by these amounts would directly impact our private land. We don't support an increase of wildlife numbers in the Brown's Park area, due to the above reasons. We also feel the vegetation in this area should not be asked to support such an increase. If the wildlife increase is necessary, we hope the increase would not occur until sufficient forage has been established, in order to decrease impacts by wildlife on government and private ground due to such events as a drought and other natural occurrences.

107-4

Riparian

The riparian on the north side of the river, Bridgeport allotment, where there is cattle grazing early in the spring, are in better health than the other side of the river. There are

107-5

107-4 We agree with your concern for sufficient forage to support objective levels of wildlife as requested by UDWR. Appendix 2 footnotes this objective stocking level request according to the condition of the habitat. We have identified approximately 300 acres of pinyon and juniper woodlands on Bridgeport allotment as a possible treatment area (refer to Appendix 8). Such improvements would be programmed and executed over the life of the RMP to coincide with anticipated wildlife increases. Vegetation monitoring would determine if objective levels could be met once all improvements are complete.

107-5 The conflict with spring cattle grazing on the Green River through Browns Park is largely with recreationists, not riparian vegetation. Cattle grazing is incompatible along this river during high intensity fishing and float boating periods. We agree, some grazing systems are used as a method of maintaining or improving riparian areas.

107-5 Cont. more willows and vegetation on the north side of the river. Grazing systems can be managed to improve or maintain riparian areas, without the exclusion of livestock.

Impacts by livestock on the riparian area of the Bridgeport allotment are considerably less than recreation impacts in this same area. Impacts by recreationists, include litter, human waste, and compaction of soil by vehicle and foot travel. More sanitation and litter facilities should be provided in the Browns Park area. A recreationist lighting his toilet paper on fire near our private ground below the lower Swallow canyon boat ramp. started a grass fire. He left and we had to fight the fire to keep it from burning onto our private land. As recreationist in this area increase, we are sure this type of incident will become more frequent.

107-6 The impact statement suggests fencing the corridor of the green river to prevent livestock impacts. Recreationist do not respect fences and we are not so sure they would consider fences very scenic. Gates would most likely be left open allowing livestock access to the river and cause more problems in the long run. Cost of fencing and cattle guards (if these would be put in, instead of gates) on each access road to the river would be enormous. Who would be responsible for the cost of fencing the corridor and maintaining the fence after it is in place?

107-7 Where are the studies that show the riparian on the Bridgeport allotment to impacted? Table A8-2 shows the condition of the riparian along the Green River in Browns Park to be in mid condition in 1990. What stage was this area in previously, is it

107-6 Much of the river corridor has already been fenced. The only area currently not fenced (and is planned for fencing) is on the north side of the river, near the pipeline crossing at the head of Little Swallow Canyon and at Little Hole, where Davenport Creek enters the Green River. BLM and/or other cooperators would fund and maintain needed fencing to control livestock grazing on the Green River. We agree that at times gates are inadvertently left open, allowing access to the corridor by livestock, therefore cattle guards would most likely be used in highly used access areas to the river.

107-7 A riparian inventory was done in 1990. Photo points and an ocular assessment of condition was conducted along the Green River through the Bridgeport Allotment. We have no record of riparian condition of this area before the inventory was done. We agree, in most cases, one year's worth of monitoring is not sufficient to determine trend. Your grazing license extends to May 30, which is well within the high use period of float boaters and fishermen for this area.

107-7 Cont. improving or degrading? One years worth of monitoring is not sufficient to determine what is happening on the ground. Could this mid condition rating be enough or the most productive stage for wildlife habitat and livestock grazing ?

The time of year that we graze this allotment is before the tourist season begins and conflicts between cattle and recreationist would be minimal and visual quality would not be a significant issue.

Economics

When this EIS talks of tourist money going into the local economy, what is considered the local economy? A lot of the people that visit this area, are just passing through and don't purchase anything locally, a lot of the recreationists come here in self contained campers that they furnished in Salt Lake or Denver, we wouldn't call this local. A majority of the fishermen in the Browns Park area just come here for one day and they bring everything they need. They are not putting any tourist dollars into the local economy. What about the $300,000 we put back into the local economy every year. As one larger land owners in Daggett County, we know any impact to us would also impact the local economy. 107-8

We feel the economics in the EIS need some rethinking. The economic value for a recreation visitor day of $25 is just a value and there is nothing showing how this figure was derived. We also feel your values of $9.19/ AUM is too low as it relates to permittees.

107-8 Please refer to our response 3-24.

Wild and Scenic River

107-9 We do not support having the Green River become a wild and Scenic river. We feel it does not qualify for anything but a recreation river. The Flaming Gorge Dam seems to prevent the river from being free flowing, which is one of the main criteria for consideration as a wild and scenic river. There are several diversions already in place, for the Browns Park Waterfowl management area, pumps for the two ranching interests, not to mention the five areas used as boat ramps. The only area that could possibly qualify would be from the dam to Indian crossing boat ramp.

107-10 We definitely would not be willing to sell our land along the corridor, due to the fact that is where one-third of our hay production for our operation comes from. We also are not receptive to the restrictions that apply to Wild and Scenic rivers. Our land on the river is very productive portion of land that supports part of our operation not to mention the large number of geese, deer and elk also found here. We are sure you would not appreciate the Federal Government telling you what you may do to improve your yards. We have seen how the Division of Wildlife Resources has let their refuge land for waterfowl turn to a noxious weed patch. We feel it is better to have that land in production for us and the wildlife, than to just add to the already enormous noxious weed problem along the Green River.

107-11 In closing, has your monitoring shown significant change in resource management and/or condition to reclassify Bridgeport as

107-9 We reconsidered our original recommendation to designate the Green River for inclusion as a scenic river in the National Wild and Scenic River System. We still concur with this recommendation. Any opposition will be considered by the Secretary of the Interior and Congress prior to a final designation. The concerns you have about intrusions into the river corridor affecting the river's eligibility and classification were discussed in the original wild and scenic river study completed in 1980. At that time it was determined that the river should be recommended for designation as a scenic river in the Wild and Scenic River System.

107-10 Thank you for expressing your concerns. Any land acquisitions undertaken by BLM in support of the upper Green River's W&SR recommendation would be from willing sellers or givers should the opportunity to acquire such lands arise. The management prescriptions for the Green River Corridor in Browns Park would affect only public lands managed by BLM.

107-11 The Bridgeport Allotment is proposed to be an "I" category allotment due to high potential for improving wildlife habitat, not due to unsatisfactory range conditions. We appreciate your desire to be involved in the decision making process and in the monitoring of your allotment. We will continue to give you the opportunity for maximum involvement.

an "I" allotment, instead of an "M" allotment and how will this affect our management? We would like to remain involved in the decisions made about management of our allotment, and would like to participate in any monitoring you do in the future. We know our rangelands are a valuable resource and we want to do our best to keep them in a condition we can be proud of. We feel this EIS is very biased towards wildlife and is not taking a multiple use approach. 107-11 Cont.

Sincerely,

Alex Radosevich

President, Willow Creek Land and Livestock, Inc.

March 28, 1992

Re: BLM Resource Management Plans

Dear Mr. Smalley:

108-1 Please restrict the Red Mountain area north of Vernal in your upcoming BLM Resource Management Plans. As you know, this is the most scenic mountain of the whole area. Motorcycles should not be allowed to ride all over it. Please support the Uintah Mountain Club's position; ie, Alternative E with modifications.

I'm specifically concerned that Red Mountain get basic-primitive non-motorized status and Level I management for the area from the top down & including the area from Moonshine Arch & the Rocky Rimbebs on the west side.

I support & prefer Alternative B but at the very least Alternative E with the Uintah Mountain Club modifications proposed.

Sincerely

Ruth L Wake
51 E 2050 N
Provo, Utah 84604

375-5519

RESPONSE TO COMMENT LETTER 108 (WAKE)

108-1 Thank you for your comments. Please refer to our response 79-2.

U.S. Diversified Group
600 Grant Street
Pittsburgh, PA 15219-4776
412 433 4670
Telex 86 6425

Resource Management

Donald R. Sexauer
General Manager

US Diversified Group

March 26, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South, 500 East
Vernal, Utah 84078

Diamond Mountain Resource Area (DMRA)
Environmental Impact Statement

Dear Ms. Smalley:

After a review of the subject DMRA document we would like to comment on its relationship to our future phosphate development area. This contiguous property block is 8,751 acres situate in Township 2 South, Ranges 22 & 23 East consisting of three federal phosphate leases (7,472 acres), one state phosphate lease (1,157 acres), and fee land (122 acres).

109-1 The description of this future phosphate operation is accurately covered in Chapter 4 - Assumptions, page 4.8. The portrayed impacts and the environmental controls which would be associated with the underground mining and surface milling operations appear realistic and are consistent with our current plans.

109-2 In Chapter 3 - Affected Environment, page 3.32, the Phosphate section mentions 4,000 acres under federal lease rather than the 7,472 acres which we control. The companion Map 3-14 does not show the KPLA extending into Township 2 South, Range 23 East as would be consistent with our leases.

For the various alternatives in the DMRA we would offer the following comments:

109-3 Alternative A - As stated on page 4.19, our lphosphate ands would be open to development with restrictions to minimize adverse impact to deer winter habitat. Development of these reserves could add 350 jobs and $4,000,000 annually to the local economy.

USX Corporation

RESPONSE TO COMMENT LETTER 109 (U.S. DIVERSIFIED GROUP, Saxauer)

109-1 Thank you for your comment. It is helpful to know our assumptions, outlined in Chapter 4, are realistic and consistent with your plans.

109-2 We have modified our figures in the proposed plan describing the number of acres under lease by USX.

109-3 Your assessment of the affect of Alternatives A and D upon USX leases is correct.

US Diversified Group

109-4 Alternative B - This alternative would effectively prevent development of phosphate reserves as stated on page 4.29, due to obscure wildlife considerations. Your statement in Chapter 1 - Minerals Management , page 1.11 appears to ameliorate these restrictions. It is stated that "Areas under existing leases will be managed in accordance with the stipulation attached to the existing lease". While "... additional restrictions could be applied to protect critical resource values ...", "These additional restrictions would not preclude the existing lease rights".

109-5 Alternative C - This appears to be concerned with impacts to cultural and paleontological resources. While there is no mention of phosphate lease lands listed under this alternative, we believe underground mining would not have an adverse impact.

109-6 Alternative D - Similar comments to Alternative A on phosphate lands.

109-7 Alternative E - Similar comments to Alternative A on phosphate lands with one exception. Designation of the Southeast quadrant of Township 2 South, Range 22 East as an ACEC could adversely impact development of the phosphate reserves since there is some overlap with planned surface facilities.

We appreciate this opportunity to review the draft DRMA.

Thank you for your interest and consideration to our comments. Would you please include us on your mailing list for the final EIS.

Yours very truly,

Donald R. Sexauer

cc: Richard F. Riordan, Consultant
Sandy, Utah

109-4 The restrictions under Alternative B would be imposed only at the time of lease renewal.

109-5 The lack of comment about phosphate in Alternative C reflects the fact that we did not believe there would be any impacts to phosphate under this alternative.

109-6 Please refer to our comment 109-3 above.

109-7 It is unlikely that ACEC designation would impact USX leases. No additional restrictions are imposed within the bounds of the ACEC that are not imposed outside. At the time of actual lease development or lease renewal, restrictions would be developed only after site specific analysis and mine plan adjustments.

UINTAH COUNTY

STATE OF UTAH

Our past is the nation's future.

COMMISSIONERS:
Max D. Adams
Lorin F. Merrell
H. Glen McKee
ASSESSOR - Lorin T. Merkley
ATTORNEY - Harry H. Souvall
CLERK/AUDITOR - Pat S. McNeill
RECORDER - Randy J. Simmons
TREASURER - Donna Richens
SHERIFF - Lloyd D. Meachem
SURVEYOR - Nelson J. Marshall

DATE: March 26, 1992

TO: Penelope Smalley and Jean Nitschke-Sinclair,
Team Leaders
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

FROM: The Uintah County Commission

RE: Diamond Mountain RMP

Uintah County is requesting the BLM to consider Alternative A, for the following reasons:

First, we recognize that the DMR Area is a very large and complex resource area. Coordination and cooperation will inevitably be needed to finish an acceptable draft. We also recognize that some team members who worked on the DMRA and EIS drafts are not native to this area and are susceptible to making mistakes. We hope these mistakes, calculation errors, etc., and personal opinions are not part of the final Alternative Draft for submittal to the Director.

110-1 Some time ago, Uintah County suggested that the Uintah County Extension Agent form a committee and respond with any concerns relative to the livestock industry. This resulted in a letter to you from the Diamond Mountain Permittees and Other Concerned Individuals. We concur with the response from that committee. Please find attached, a copy of this letter, also signed by the Uintah County Commission.

110-2 43 CFR § 1610.3-1 (d) states "A notice of intent to prepare, amend, or revise a resource management plan shall be submitted, consistent with State procedures for coordination of Federal activities, for circulation among State agencies. This notice shall also be submitted to Federal agencies, the heads of county boards, (and) other local government units."

Also, referring to Chapter 5, Consultation and Coordination, page 5.1, third paragraph, "Initial steps in the process began in 1988, with the development of a preparation plan. Other early efforts included research, inventory, analysis, and interagency coordination." Further, also on page 5.1, under the heading of Consistency, paragraph 1, "Coordination with other agencies and

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COUNTY BUILDING • 152 EAST 100 NORTH • VERNAL, UTAH 84078

RESPONSE TO COMMENT LETTER 110 (UINTAH COUNTY COMMISSION, McKee, Merrell, Adams)

110-1 We are in receipt of the Diamond Mountain Permittees and Other Concerned Individuals' letter (comment letter #226). Both the Uintah County and Daggett Soil Conservation District submitted copies of the permittees' letter with their own individual comments. Please refer to our specific responses to the Diamond Mountain permittees' letter as requested by the Daggett Soil Conservation District (comment letter #179).

110-2 We believe we are in compliance with the regulations regarding public scoping and involvement and have made every reasonable effort to involve Uintah County in the preparation of this plan. At the onset of the RMP process, several public scoping meetings were held to identify issues and discuss the then-upcoming plan. A scoping meeting was specifically held on November 2, 1988. It was stressed at this meeting (and at every opportunity) that at any time the public, including county officials, was encouraged to contact the BLM to express their concerns and/or offer suggestions. In September 1989, planning issues and criteria, developed after input from the public scoping meetings were mailed. In September 1990, members of the Uintah County Commission were invited to attend a two-day briefing and tour for the Governor's Resource Development Conservation Committee to familiarize them with the issues and scope of the RMP. An update report was mailed to all interested individuals and organizations in January 1991. This report briefly outlined the alternatives under consideration. Again county commissioners of Uintah County were provided information and the opportunity to respond. The draft document was released for public review and comment in January 1992. An open house on the draft RMP was held on January 29, 1992, in Vernal to assist the public in their review of the draft document. Team members have made numerous contacts with the county commissioners during the scoping and alternative development stages. In addition one of the commissioners has been on the Vernal District Advisory Council throughout the process, and therefore had numerous opportunities to become involved.

consistency with other plans were accomplished through frequent communications and cooperation efforts between the BLM and involved federal, state , and local agencies and organizations." And, in paragraph 2, "The RMP team reviewed the land use plans for Daggett, Duchesne, and Uintah Counties to ensure consistency. BLM personnel have met with the respective county planners and commissioners to promote greater understanding of goals, objectives, and resources of both the counties and the BLM."

Chapter 1, page 1.14, "The Planning Process", reviews "Action Steps In The Planning Process". Step 1 states that Issues and Management Concerns will be identified. This is intended to expose concerns, conflicts, or opportunities which can be resolved through the planning process. "The BLM managers and specialists from the Diamond Mountain Resource Area and Vernal District staffs held several scoping meetings in November, 1989. The public, other federal agencies, and state and local governments were asked to participate in this scoping process. Information from these sources was combined by BLM into three broad land-use planning issues appropriate for resolution in the RMP/EIS planning process."

110-2 Cont.

According to the Federal Statutes quoted, the initial contacts by your agency with the Uintah County Commission should have begun in 1988. The BLM should have met with the county, one on one, and explained what the resource area consists of, how many anticipated alternatives would be considered, and possible conflicts, concerns or opportunities that might exist. Such contacts would have discovered existing county plans and policies which could have been considered.

The present County Governmental Administration (Commission) is not the same administration that existed in 1988 and 1989. Therefore, the Uintah County Commission hereby notifies you that we do not agree that you have complied with the regulations and statues with regard to our involvement in the planning stages which have been quoted in this letter, and in your draft document. We respectfully request that any reference to "local government", "county government", "county commission", "county agency or departments", "county planner", or other terms which would refer to Uintah County, including but not limited to Chapter 5, Consultation and Coordination, be withdrawn from the document.

The Uintah County Commission was essentially left out of the early planning process which eliminated our input regarding social, economic, cultural and custom data, as suggested in Chapter 5, Consistency, paragraph 2. Team leaders may not have intentionally neglected to solicit our input, however, they must be responsible for this oversight.

110-3 Uintah County is asking the BLM to consider our issues and position as stated in the Uintah County Interim Land Use Policy, adopted October 1, 1991.

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110-3 To the extent the Uintah County Interim Land Use Policy is consistent with federal regulations, we will naturally adhere to the county's policy. In those instances where the policy outlines adherence to state or local laws and ordinances contrary to federal directives, we would have to arrive at some common understanding. Be assured that we will continue to consult and coordinate closely with the county on matters that may/will involve the county or its residents.

110-4 Under the general comments section of the attached letter from the Diamond Mountain Permittees, etal, we wish to make additional comment regarding the economic impact of the $54,000,000 annual revenue generated in the three county area from livestock and livestock products. There is no evidence to substantiate that people from outside the Uintah Basin will offset the annual loss in revenue from reductions in AUM's or general ranching operations. Ranching and agriculture are the major economic cornerstones of local community stability.

From this point, we will address specific sections of the draft and our concerns:

Section: Chapter 1 Purpose and Need

Page 1.17 Step 2 - Original criteria were developed in early 1990, and sent to interested parties.

Page 1.17 Step 3 - Collection of various kinds of data. During this phase, special status plant species were inventoried during the summer of 1989.

Why was step 3 done prior to step 2 ?

110-5 Neither the present County Commission or the County Public Lands Representative were aware of any DMRA planning effort until some time during Step 5, in mid-summer, 1990. The preferred Alternative E, was not specifically discussed with the County before it was selected.

On July 10th, 1991, a second notice was sent to team leader Smalley requesting a copy of maps or material relating to Alternative E. Was the material available at that time? Attached is a copy of the second letter of request.

Chapter 2 - Common Management, Riparian Management

110-6 Page 2.10 It states that on January 22, 1987, BLM issued its national riparian area management policy which defined the term riparian area, set management objectives, and outlined specific policy direction. This policy should not be subject to the liberal extended definition as given on page A6.1, titled Utah State Office Policy, Riparian Area Management Policy, IM UT 87-261 Revised, February 28, 1988. The Utah definition, in our opinion, goes far beyond the National BLM Director's original definition and intent.

Reintroduction of Black Footed Ferret

110-7 We would prefer that introduction or reintroduction of the Black Footed Ferret be eliminated from the document. We have no satisfactory evidence that this mammal ever inhabited Uintah

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110-4 Thank you for your comments. Please refer to our response 104-2.

110-5 Again, please refer to our response 110-2. We have consulted with and encouraged participation by the county commissioners at the outset and through out this planning project. We believe we have complied with BLM's established procedures and in the established order for completion of a major planning document such as an RMP.

110-6 The Utah State BLM Riparian Policy is an extension of the National BLM Policy and describes guidelines to further the national policy statements including initiating management to maintain, restore, or improve riparian values.

110-7 Documentation that the black-footed ferret inhabited Uintah County has been shown in the Black-footed Ferret Recovery Plan (USF&WS, 1988, p. 7) and the Draft Black-footed Ferret Reintroduction and Management Plan for the Coyote Basin, Utah Complex (USF&WS, 1991, p. 5). It is BLM's opinion that this is satisfactory evidence presented by USF&WS and UDWR that black-footed ferrets have indeed inhabited Uintah County. Prior to any reintroduction, a site specific plan will be prepared with the assistance of a local committee representing all affected interests.

110-7 Cont. County. At some point, with the existence of the Ferret, an EIS would be required prior to any improvements, sowing of new vegetative habitat, or improving range or ranches in general. We prefer that this not be a part of the agenda for the Diamond Mountain Resource Management Plan.

Chapter 4 - Assumptions

110-8 Page 4.5 It states that for the life of the plan, the price of oil will equal $20 per barrel, and the price of gas will be $1.50 per thousand cubic feet. Future demands are certainly going to place these prices at higher levels than have been assumed in the draft document. We feel these figures are underestimated.

110-9 Page 4.16 It states under "From Management Actions for Special Emphasis Areas" that not designating Nine Mile Canyon, Red Mountain-Dry Fork or Browns Park Complexes as ACEC's would make it more difficult to stabilize and protect the important cultural resources within these areas because they would not receive the management priority consideration afforded an ACEC. We disagree with this thinking. These were nominations by the Nature Conservancy and the Uintah Mountain Club, and are not necessarily worthy of being granted special management consideration. Do the opinions of these two environmental groups merit the extension of additional ACEC's?

110-10 Page 4.17 "From Management Actions for Livestock Programs", states that it is intended to eliminate domestic sheep grazing within 10 miles of identified Big Horn Sheep reintroduction areas. Again, we concur with the comments given by the Diamond Mountain Permittees findings, that the 10 mile buffer is not defendable.

110-11 Alternatives A and E, have distinctly different land areas in Level 1 through 4. Future oil, gas and mineral inventories are presently unknown and we cannot place more restrictive levels of management on these areas that could contribute to the future economic welfare of the Uintah Basin. For an example, are there valuable trace minerals, uranium, or deep overthrusts of hydrocarbon reservoirs that are presently undiscovered? It wasn't until the late 1970's that the overthrust major hydrocarbon reservoirs were discovered in Uinta County, Wyoming, just North of the Diamond Mountain Resource Area.

Uintah County would like some language inserted in the proposed final draft to state that if any future unknown resources or reserves (hydrocarbon minerals or otherwise), are discovered within the DMRA, that local government be included with other appropriate agencies to make necessary amendments to the plan to accommodate the development if deemed economical.

110-12 Mineral leasing is incompatible within approximately 65% of the lands in the Red Mountain-Dryfork complex. The entire area is

4

110-8 We agree that the price of oil and gas may fluctuate over the next 15 years and demand may increase. However, for analysis purposes, the current oil and gas prices were used. Should the price of oil and gas significantly change, the economic impacts to oil and gas companies would also increase significantly as would the benefits from production.

110-9 ACECs may be nominated by anyone. Justification for an ACEC and supporting documentation must be submitted to BLM for consideration. The Nature Conservancy, Uintah Mountain Club and the Utah Chapter of the Archaeological Society each nominated and supplied supporting documentation for their areas of concern. During the development of the RMP these nominations were analyzed and if found to be compatible with the overall management objective for one or more of the alternatives developed, they were included in that alternative.

110-10 There are numerous studies recommending a buffer between domestic and wild sheep. At the outset of this planning project, we identified a need to know which recommended buffer size, if any, would be appropriate for the specific topographic situations within the Basin. At that time no bureau guidelines were available. A committee of local experts was formed, with representatives from UDWR, CDOW, USFS, NPS, BLM and local veterinarians. A buffer up to 10 miles was recommended by this committee to account for the Basin's unique topographic features while minimizing the possible threat of disease transmission between both sheep species from common water and gathering facilities and direct species contacts. The wording of the proposed plan, involving opportunities to create this buffer through negotiations with the involved permittee(s), allows us the greatest management flexibility for each potential reintroduction site.

As a point of historical accuracy, the Bureau did issue draft guidelines (under Instruction Memorandum No. 92-239) which recommends a 9-mile buffer. This guidance was issued after the draft RMP was released for public comment. We sought clarification from our Washington office as to which buffer guideline to propose. Based on this consultation, it was determined that a 1 mile difference in buffer zones would not be significant, again with the condition that negotiations would be used prior to any final reintroductions. This documentation as to the rationale for the proposed plan has been added to Chapter 3. Please also refer to our responses 116-8 and 179-39.

110-11 Should significant mineral resources be discovered in the resource area which require a plan amendment, the Uintah County and other appropriate agencies would be involved.

110-12 Please refer to our response 61-2.

110-12 Cont. mapped on page 2.111, map 2-7, of the Draft EIS. The map should be amended to include only the areas West of Highway 191. This is consistent with the 1000+ signatures relative to this issue. All alternatives should recommend withdrawal of mineral leasing for this area at the expiration of the current lease period. A reassessment of management levels for this special management area needs to be done.

In summary, we strongly encourage you to consider our concerns, these recommendations and potential conflicts. The impact of the DMRMP has an important influence on the local economy, and quality of our present and future customs, culture and community stability.

Sincerely Yours,

H. Glen McKee

H. Glen McKee

Lorin F. Merrell

Max D. Adams
UINTAH COUNTY COMMISSION

UCC:dc
enclosures
cc: Jim Parker

QUESTAR PIPELINE COMPANY

79 SOUTH STATE STREET • P. O. BOX 11450 • SALT LAKE CITY, UTAH 84147 • PHONE (801) 530-2511

March 26, 1992

TIMOTHY E. BLACKHAM
DIRECTOR, PROPERTY AND
RIGHTS OF WAY DEPARTMENT

Ms. Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Subject: Comments on Diamond Mountain Resource Area - Draft Resource Management Plan and Environmental Impact Statement.

Dear Ms. Smalley:

Questar Pipeline Company (Questar) is an interstate natural gas pipeline company that operates gathering, transmission and storage pipeline and related facilities in Colorado, Utah and Wyoming. Questar operates over 2,400 miles of pipelines within the Rocky Mountain area. Our company provides Uinta Basin producers with gathering, transportation and storage services and with access to customers, markets and other pipeline companies within the region.

Questar's pipeline facilities within Daggett, Duschene and Uintah Counties presently have an assessed valuation of $72,600,000. During 1991, Questar's property taxes to these counties totaled $714,400.

As such, Questar has a sizable facility and operating investment within the Diamond Mountain Resource Area, and appreciates the opportunity to provide comments on the draft Resource Management Plan and Environmental Impact Statement (RMP/EIS).

1. Oil and Gas Management Categories:

111-1 *The RMP/EIS recommended management plan (Alternate E) provides for a mix of management actions allowing for resource development while protecting environmental values. However, this approach proposes that an increasing highpercentage of resource development areas now be subject to controlled or restricted stipulations (Category 2 and 3) while substantially less resource acreage is subject to standard stipulations. In fact, percentage of lands classified as Category 2 and 3 increase from 50% to 77% while Category 1 development lands decrease from 50% to 23%. In a region heavily dependent upon the oil and gas industry and during*

RESPONSE TO COMMENT LETTER 111 (QUESTAR PIPELINE COMPANY, Blackham)

111-1 The socioeconomics sections of the proposed plan/final EIS have been expanded from the draft. Please refer to the socioeconomics sections of Chapter 4.

111-1 Cont. *somewhat difficult financial times, this reduction of available acreage presents a potential negative impact to the area's economic growth. The RMP/EIS should consider management direction that encourages oil, gas and mineral development which in turn supports the economic growth and stability of the surrounding communities and helps fund the state and federal agencies which manage the lands, resources and wildlife.*

2. *Designated "No Surface Occupancy" Areas:*

111-2 *Areas being considered for "no surface occupancy" (NSO) should be carefully evaluated prior to designation. Usually, NSO areas are restricted from use in order to protect particular wildlife species, improve riparian or range land areas, avoid water shed areas or close areas due to other environmental concerns. Often, the oil and gas industry has demonstrated that its activities can be scheduled and conducted without disturbance to wildlife or environmental issues. In addition, state-of-the-art construction and reclamation techniques have been successful in minimizing land disturbance and reducing environmental impacts. Overall the BLM is urged to work with industry where possible regarding particular NSO designated areas to resolve problems and allow development within these areas.*

3. *Existing Leases and Rights-of-Way:*

111-3 *Questar urges that BLM maintain provisions to acknowledge and honor the valid existing rights granted for leases and rights-of-way associated with the location and operation of existing facilities. These existing facilities located within proposed Wild and Scenic River corridors, recreational use areas, or ACECs should not be subject to new or additional conditions or stipulations contained within the RMP/EIS.*

4. *Utility Corridors:*

111-4 *The RMP/EIS Preferred Alternative apparently designates a "utility corridor" across the Diamond Mountain, Browns Park, and Ewing Canyon areas. This utility corridor has a bottle neck at Jesse Ewing Canyon. Presently four pipelines pass through the area. The proposed quarter mile wide corridor is to be reduced to 1/8 mile in the canyon due to slopes greater than 30% which is felt by the RMPto be unsafe for heavy equipment. The preferred alternative E states that the bottleneck will allow only a maximum of three new facilities in the corridor essentially closing the North-South passage between Utah and Wyoming. In Chapter 3 of the draft, EIS, it is stated that "Jesse Ewing Canyon in Browns Park has four major pipelines*

111-2 BLM should work closely with industry before NSO designations are formulated in order to allow development, while still protecting critical resource values. NSO stipulations are only proposed where they were deemed to be the least restrictive to protect crucial or important resource values.

111-3 Please refer to Chapter 1. Within the opening paragraphs of Chapter 1 the document states: "...valid existing rights take precedence over any management decisions depicted on the alternative maps. Nothing on the alternative maps should be interpreted as challenging those rights." Also within Chapter 1 the planning criteria (those constraints or ground rules to which the RMP and associated EIS are developed) specifically states: "All alternatives recognize the existence of valid existing rights. Nothing in the management options identified would preclude those rights." These directives also apply to the proposed plan.

111-4 Chapter 3 has been clarified to support the decision regarding the utility corridor through Jesse Ewing Canyon. Under the proposed plan the canyon would not be closed to major rights-of-way; however, we believe the Canyon could only support up to three additional rights-of-way.

111-4 Cont. *and reached capacity". This North-South corridor is critical to energy transportation in the region.The route should not be closed at the present time and the RMP should be open to new technologies which could allow for the safe installation of new facilities while mitigating environmental impacts.*

5. *Black-Footed Ferret Reintroduction Areas*

111-5 *Proposed black-footed ferret reintroduction areas identified as Shiner and Antelope Flats overlap existing pipeline rights of way. The draft EIS places restrictions on surface activities from March 1, through August 31st within 1/4 mile of the habitat occupied by the black-footed ferret. However, the draft EIS states "these restrictions will not apply to maintenance and operation of existing facilities". These restrictions should not be placed on maintenance and operation when these rights of way are renewed.*

6. *Areas of Critical Environmental Concern*

111-6 *The preferred alternative E creates several areas of critical environmental concern (ACEC), which overlap existing Questar facilities. The impetus into most of the overlapping ACEC's is the wildlife in the area. Sage grouse strutting grounds, critical deer and elk winter habitat, raptor protection zones and black-footed ferret reintroduction will all effect future pipeline activities in the area. The cumulative effect of these protection zones should not be to prevent current and future natural gas transportation and storage in area.*

In summary, the Diamond Mountain Resource Area is in a critical area for natural gas activities. The unique geology of the area has allowed the development of an underground gas storage facility at Clay Basin. The utility corridors and pipelines in the area are critical routes for supplying natural gas to much of the country. One of the national environmental issues addressed in the RMP were activities that "...can positively affect current trends involving global climate changes and acid rain". Continued development of clean burning natural gas will have a positive effect.

Questar and its affiliate companies, have been active in the oil and gas business within areas covered by the RMP/EIS for over 50 years, and urges BLM to consider management direction which encourages economic stability and honors existing leases and rights. Questar appreciates the opportunity to submit these comments pertaining to the draft RMP/EIS.

Very truly yours,

Timothy R. Blackham

TRB/gf

111-5 Under 43 CFR 2881.1-1(f) the authorized officer may modify the terms and conditions of the right-of-way at the time of renewal. According to the right-of-way grant authorized in 1989 for the Questar pipeline in question, the renewal date is October 2019, which should alleviate your concerns. It is reasonable to assume that restrictions concerning black-footed ferrets will probably be updated by the time Questar's right-of-way is renewed.

111-6 We believe the protection zones created in the proposed plan in the ACEC also offer windows of activity or areas that could be used for current and future natural gas transportation and storage.

March 20, 1992

Penelope Smalley, Team Leader
Bureau of Lamd Management
Vernal District
170 South 500 East
Vernal, Ut. 84078

Subject: Diamond Mountain Resource Management Plan Draft E.I.S.

Dear Ms. Smalley,

I must commend you and your team for the comprehensive effort in creating the Draft EIS of the Diamond Mountain Resource Management Plan.

112-1 After close review of the Diamond Mountain Resource Management Plan, I have some concerns about phosphate leases in the Red Mountain-Dry Fork Complex.

This is a very unique area because of it's wide diversity of high quality resource values within a close proximity to an urban area. It will be very important to determine the best use of this land. To do this we must first identify the resources of the area. The resources of the Red Mountain-Dry Fork complex are:

1. Recreation (Hunting, Fishing, Camping, Picnicing, Hiking, Skiing, Riding of Horses, Bicycles, Snowmobiles, and OHVs)
2. Scenic Vistas and Aestetics
3. Riparian Areas
4. Wildlife Habitat (Including crucial winter range for Deer and Elk)
5. Cultural and Historical Resources
6. Watershed (Surface and Underground Aquafir)
7. Vernal Area Municipal Water Supply
8. Archeological and Paleontological Sites
9. Biological Diversity
10. Relict Vegetation

ACEC designation is in tune with the best use of these lands. In light of critical resource values identified in the ACEC nomination for this area, no alternative addresses the impacts to these resources should mining occur. Alternatives B, C, and E designate the Red Mountain, Dry Fork Complex as an Area of Critical Environmental

RESPONSE TO COMMENT LETTER 112 AND 113 (GODDARD)

112-1 Thank you for expressing your concerns. Please refer to our response 61-2.

Concern. However, withdrawls for this area have not been considered. The potentially unacceptable impacts are as follows:

1. Changes to Municipal Water Supply Aquafirs
2. Changes to the 100 Year Flood Plain
3. Changes to Local Springs
4. Noise from Blasting and Equipment
5. Degradation of Scenic and Environmental Values
6. Degradation of Property Values

For these reasons mineral leasing is incompatible within 100% of the lands in the Red Mountain-Dry Fork Complex, a total of 25,800 acres. This area is mapped on page 2.111 of the Draft EIS for the Diamond Mountain Resource Management Plan dated November 1991.

All alternatives should recommend withdrawl of mineral leasing for this area at the expiration of the current lease period. A reassessment of management levels for this special management area needs to be done.

I look forward to working with you in developing the site specific management plan for the Red Mountain-Dry Fork Complex area.

Thank You,

Michael Goddard

MICHAEL GODDARD
10348 N. DRY FORK
VERNAL, UT, 84078

OFFICE OF PLANNING AND BUDGET
Resource Development Coordinating Committee

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Salt Lake City, Utah 84114
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March 26, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

SUBJECT: Draft Resource Management Plan/Environmental Impact Statement for the Diamond Mountain Resource Area
State Identifier Number: UT911223-010

Dear Ms. Smalley:

The Resource Development Coordinating Committee, representing the State of Utah, has reviewed this draft RMP/EIS. Following are comments from various state agencies:

State Lands and Forestry

Preferred Alternative

114-1 Designations such as management priority areas and special emphasis area, with associated surface occupancy restrictions, withdrawals, use restrictions, etc., may adversely affect trust land management goals within DMRA. For the alternatives presented, the management theme for Alternative D is the most consistent with trust management goals, therefore, the Division of State Lands and Forestry recommends Alternative D for the preferred alternative.

Utility Corridors

114-2 At this time, we see no reason why the state lands in the corridors would not be available for use as utility corridors. However, we cannot guarantee continued availability over the long term.

Land Exchanges

114-3 We are somewhat disappointed that the draft RMP doesn't specifically identify trust lands for potential federal acquisition. However, Tables 2-14 through 2-18 provide a reasonable framework for development of exchange scenarios. Given the apparent preference to

RESPONSE TO COMMENT LETTER 114 (Resource Development Coordinating Committee, Barber)

114-1 Thank you for your comment.

114-2 Thank you for your comment.

114-3 Standard operating procedures involving land ownership adjustments are outlined in Chapter 2. The DMRA Management Situation Analysis provides a list of state lands BLM would be interested in acquiring. For this reason the RMP includes guidelines that would allow the greatest management flexibility involving land ownership adjustments.

114-3 Cont. pursue exchanges/acquisitions as opportunities arise, we wonder which agency (BLM or DSLF) will make the first move. If we receive an application for a trust land use that the BLM may perceive as inconsistent with its objectives in an area, we may find it difficult to opt for an exchange to accommodate BLM's management objectives.

Executive Order Withdrawal

114-4 The oil shale protection withdrawal imposed by executive order is characterized as "**not being used for its intended purpose**" (page 3.20). The withdrawal seems to work to the detriment of other management objectives in the DMRA. Perhaps the RMP should develop the rationale for a recommendation by the Secretary of the Interior that the withdrawal be terminated.

Utah Natural Heritage Program

As with previous comments during the Diamond Mountain planning process, the Heritage Program response to the DRMP focuses on two major topics: 1) the identity and treatment of rare plants, and 2) the recognition and continued protection of natural areas on the Resource Area.

Rare Plants

114-5 Two definitions pertaining to rare plants in Appendix G of the DRMP were reviewed. The definition of "CANDIDATE SPECIES" (page G.2) is correct, but the definition of "SENSITIVE SPECIES (page G.12) may not be. In particular, we suggest checking the statement that "The sensitive list is made up of species listed as Category 3c in the *Federal Register*..." It is our understanding that the BLM list of sensitive species (at least plants) in Utah is essentially the same as the U.S. Fish and Wildlife Service (USFWS) list of Candidate species (Categories 1 and 2). That is, the BLM has provision for creating its own list of sensitive species, but for plants (at least) has chosen to make this list essentially identical to the USFWS Candidate species list, not the Non-Candidate (Category 3c) list. Clarification of this topic could probably best be done by the BLM State Botanist.

Table 3-26 on page 3.69 shows the identities and current status of special-status plants known or potentially occurring in the Diamond Mountain Resource Area. We suggest a few minor revisions to this table based on the following:

114-6 1. The table includes Non-Candidate (Category 3c) plants as well as Candidate and listed plants. However, the table does not include all of the known Category 3c plants on the Resource Area. We suggest that the table be consistent and include either all or none of such Category 3c plants. For sake of brevity, perhaps it would be best to include none of them.

114-4 Rather than remove the Oil Shale withdrawal in its entirety, the proposed plan specifically outlines those areas where a withdrawal termination is recommended.

114-5 Thank you for your comment. We agree, please refer to the Glossary for a correction of the term sensitive species.

114-6 We agree, Category 3C plant species have been deleted from the table.

114-7 2. Status of a few of the plants are different than shown in the table, either through the table being in error or from status changes that have taken place since publication of the DRMP. We also suggest referring to Category 1 and 2 plants as "C1" and C2" rather than "1C" and "2C", in keeping with the most common usage of these abbreviations.

3. There are a few minor corrections needed based on taxonomic changes and spelling.

With these suggested revisions, the plants and statuses of Table 3-26 would appear as follows:

114-8

COMMON NAME	SCIENTIFIC NAME	STATUS	(Heritage Comments)
Park Rock Cress	*Arabis vivariensis*	–	(To become C2 in '92)
Horshoe Bend milkvetch	*Astragalus equisolensis*	C1	
Hamilton milkvetch	*Astragalus hamiltonii*	C2	(Is not C1)
Ownbey's thistle	*Cirsium ownbeyi*	C2	(Note correct spelling)
Untermann's fleabane	*Erigeron untermannii*	C2	
Barneby's pepper cress or ridge cress	*Lepidium barnebyanum*	E[4]	
Flowers penstemon	*Penstemon flowersii*	C2	
Gibbens beardtongue	*Penstemon gibbensii*	C2	
Goodrich's beardtongue	*Penstemon goodrichii*	C2	
Graham's beardtongue	*Penstemon grahamii*	C1	
Clay reed mustard	*Schoencrambe argillacea*	T[5]	(Newly listed)
Toadflax cress	*Schoencrambe suffrutescens*	E[2]	(Not Glaucocarpum)
Uinta Basin hookless cactus	*Sclerocactus glaucus*	T[1]	
Ute ladies' tresses	*Spiranthes diluvialis*	T[4]	(Newly listed)

1. 44 FR 58870; dated October 11, 1979
2. 52 FR 37420; dated October 6, 1987
3. 55 FR 39864; dated September 28, 1990
4. 57 FR 1403; dated January 14, 1992
5. 57 FR 2053; dated January 17, 1992

Next with regard to rare plants, we believe it is important for the eventual RMP to state the level of formal protection that will be given to special-status plants through law and/or BLM policy. This appears to be done adequately in the following parts of the DRMP:

114-9

1. In Chapter 2, under the section MANAGEMENT GUIDANCE COMMON TO ALL ALTERNATIVES, the management governing special-status plants (page 2.14) is the same as that outlined for special-status animals (page 2.5-6). The latter policies appear to be adequate for plants as well as animals, and it is appropriate that such management is the same in all alternatives.

2. The statements for "Special Status Species" on page 2.60 are also good (though there appears to be an unintentional double negative in the statement under Alternative A).

114-7 The table has been updated to reflect changes in status. Thank you.

114-8 Please refer to our response 114-7 above.

114-9 The unintentional double negative for Alternative A has been corrected.

114-9 Cont. 3. Under Alternative E, the above management directions appear to be further strengthened by defining listed T/E plant habitat as Management Level 2 and Candidate plant habitat as Management Level 3.

114-10 Finally, a key objective in the Recovery Plan for *Sclerocactus glaucus* was that certain significant populations of the species on public lands receive special designation and management protection. The designation and (most importantly) proposed management of the Nine Mile Canyon and Pariette Wetlands ACEC's appear to satisfy this Recovery objective. If the U.S. Fish and Wildlife Service concurs, then these two ACEC designations could hasten *Sclerocactus glaucus's* eventual removal from the list. The Heritage Program thus strongly supports designation and management of the Nine Mile Canyon and Pariette Wetlands ACEC's as proposed in Alternative E.

Natural Areas

114-11 The Natural Heritage Program supports ACEC designation as proposed in Alternative E for the three relict vegetation areas on the Diamond Mountain Resource Area. These areas are Red Mountain (north of Vernal), Castle Cove (northwest of Vernal) and Leers Canyon (tributary to Argyle Canyon). The first two are included within the larger proposed Red Mountain-Dry Fork Complex ACEC, while the latter would be an ACEC by itself. If the BLM decides to adjust the boundary of the Red Mountain-Dry Fork Complex ACEC as a result of public comments, then we recommend that the individual Red Mountain and Castle Cove relict areas retain their proposed ACEC status and management.

114-12 We support and recommend carrying forward almost all of the individual management prescriptions for the above two ACEC's, as shown in Table 2-18 of the DRMP. Rather than listing all of the items in this table with which we agree, we will only comment on one possibly questionable item. It concerns the prescription for fire in Leers Canyon found on page 2.114. In a near-relict area, it seems best to let fire have as near to natural a role as possible in the context of the surrounding lands. It is not clear if the "prescribed fire" in Leers Canyon refers to: (1) wildfires that are managed in certain ways rather than being immediately suppressed, or (2) fires that are intentionally set and then managed. In the latter case, it would not seem appropriate to let intentional burns be used as a tool to support crucial big game habitat management objectives as ends in themselves. Given Leers Canyon's small size and long/narrow orientation, there should be ample surrounding land on which to conduct intentional burns for big game habitat. As a contrast, the prescription for fire in the Red Mountain relict area (page 2.115) reflects the goal of maintaining fire's natural role.

Division of Water Rights

The Division of Water Rights has two concerns that we would like to see addressed in the final EIS. They concern (1) water rights for instream flow, and (2) wetland improvement at Pariette Draw.

114-10 Thank you for your support of these ACEC nominations.

114-11 Thank you for your support of the ACEC designations for the relict vegetation areas. The boundaries of the encompassing Red Mountain-Dry Fork ACEC Complex has not been modified in the proposed plan.

114-12 BLM agrees. We have changed the fire prescription for the Lears Canyon ACEC in the proposed plan to read: "Maintain the natural role of fire within the relict vegetation area. Large scale fires would not be allowed to kill more than 50 percent of the pinyon-juniper community, or 40 percent of the Douglas fir-mountain browse community in Lears Canyon over the life of this RMP. Outside of the relict vegetation area, allow fire to burn under prescribed conditions to support the stated values of a vigorous, healthy vegetation community, to support critical soils; and, crucial wildlife habitat."

114-13 In several locations in the EIS, it says that the Bureau of Land Management will seek to acquire water rights on certain streams for the purpose of maintaining instream flows and riparian habitat. However, there is no explanation of how such water rights will be acquired. At this point, we assume that acquisition will be made from willing sellers and in accordance with Section 73-3-3(11), Utah Code Annotated. Whatever method the BLM chooses to fulfill their objective should be stated in the final EIS and conform to state law.

114-14 The BLM also proposes to improve the wetland habitat in the Pariette Draw area. They give little information in the Draft EIS on how they will accomplish this improvement. We are particularly interested in where they propose to get the water they will need for making the improvement. Again, their methods should be stated in the final EIS and conform to state law.

Division of Wildlife Resources

Alternative A

114-15 This alternative places seasonal restrictions on activities occurring in sage grouse nesting areas and peregrine falcon nesting habitat, but the restrictions are not adequate. Restrictions on sage grouse nesting habitat should be from mid-March through June and peregrine restrictions should be from February through August.

114-16 Page 2.18, Paragraph 4 states that surface-disturbing activities would be allowed within the 600-foot riparian buffer zone if there was no practical alternative. However, there is no mention of mitigation measures if such activities were to take place. Riparian habitats are critical to most wildlife species. Surface disturbing activities result in severe negative impact through loss of such habitat. The BLM's Riparian Area Management Policy states that long-term losses of riparian habitat must be mitigated. If this alternative is chosen, mitigation measures must be included in environmental assessments tied to this RMP. We also believe a statement referring to coordination between your resource area and the Army Corps of Engineers would be necessary before any decision document is signed concerning potential loss of jurisdictional wetlands.

Alternative B

114-17 This alternative is the alternative of choice for the Division of Wildlife Resources. It provides for active management of wildlife populations and wildlife habitat. It provides for restriction of activities which would adversely affect wildlife species. This alternative also provides the greatest protection to critical wildlife habitats and wildlife species which are threatened, endangered, or in need of special attention. From a wildlife perspective, this would be the preferred alternative.

114-13 The following statement has been added in Chapter 2: "Water rights acquisition will be made from willing sellers and in accordance with Section 73-3-3(11) Utah Code Annotated.

114-14 BLM proposes to continue habitat maintenance and development at Pariette Wetlands for waterfowl production, riparian enhancement, and reduction of sediment loading of the Green River. Any additional water acquisitions for Pariette Wetlands would be from willing sellers and in accordance with Section 73-3-3(11) Utah Code Annotated.

114-15 Please note, comments 114-15 through 114-33 are identical to comment letter #8 (UDWR, Moretti). Please refer to our response 8-2.

114-16 Refer to our response 8-3.

114-17 Refer to our response 8-4.

Alternative C

114-18 While this alternative provides restrictions on sage grouse strutting grounds, no protection zone is described. This alternative also lacks adequate seasonal restriction of activities for sage grouse nesting areas and peregrine falcon nesting areas. Sage grouse restrictions should be from mid-March through June and peregrine restrictions should be from February through August.

114-19 This alternative does not provide for protection of potential bighorn sheep and black-footed ferret reintroduction sites. This should be included in the DMRMP as these are animal species requiring special consideration. Existing BLM Habitat Management Plans for this area outline actions for the reintroduction of bighorn sheep and black-footed ferrets (Page 2.7) and should be considered in this RMP.

114-20 Any additional AUMs realized through range improvements would be assigned to livestock. We realize that this is the objection of this alternative, but not allocating any of the additional AUMs for wildlife makes this alternative unsatisfactory to DWR.

114-21 The riparian buffer zone is only 330 feet in this alternative. While this provides for some protection of these sensitive areas, a 600 foot or greater buffer zone would be preferred. There is no mention of mitigation for riparian habitat loss when such loss is unavoidable. Mitigation must be considered for riparian losses.

Alternative D

114-22 Concerns regarding this alternative are similar to those expressed under Alternative C. There is no protection zone outlined for sage grouse strutting grounds. Seasonal restrictions are not adequate for sage grouse and peregrine falcons. Black-footed ferret introduction sites do not receive adequate consideration and protection. Additional AUMs acquired through range improvements are assigned to livestock with none assigned to wildlife. The intent of this alternative is to minimize wildlife restrictions to mineral exploration and development. Impacts from these activities often have a negative effect on most wildlife species. These impacts must be considered in the RMP. Page 2.5, Paragraph 8 states that it is the BLM's responsibility to recognize opportunities to maintain, improve, and expand wildlife habitat. Activities related to mineral exploration and development often conflict with this objective. Alternatives which minimize negative impacts on wildlife should be considered.

Alternative E

114-23 This alternative provides for the best implementation of multiple use of the resource area. The DWR supports the effort to protect wildlife and the environment while providing for the development of other resources. We would suggest that wildlife be considered initially for additional AUMs developed from range improvements. Page 2.30, Paragraph 7 states that these AUMs would initially go to livestock. Experience has shown that it is difficult

114-18-20 Refer to our responses 8-5 through 8-7.

114-21 Refer to our response 8-8.

114-22 Refer to our response 8-9.

114-23 Refer to our response 8-10.

114-23 Cont. to assign AUMs to wildlife that were previously assigned to livestock. We would also suggest that the riparian buffer zone be expanded from 330 feet to 600 feet as in Alternative A. This would allow for greater protection of critical riparian areas.

The following comments may apply to several of the alternatives:

114-24 Monitoring should occur to identify areas of use by peregrine falcons. DWR is concerned that prairie falcons and goshawks were omitted from the list of raptors occurring in the area. There are known locations of these species in the Nine Mile Canyon and other areas. The Northern goshawk is a USFWS category 2 species requiring special management. The prairie falcon is a raptor of special concern. Ferruginous hawks, also a USFWS category 2 species, are located within the DMRA. A 0.5 mile buffer zone around active nests and seasonal restrictions from March through July would be required for these species. We would also like to emphasize the presence of golden eagles in the area. DWR would like raptor surveys conducted prior to implementation of management activities. After the data is gathered, it should be made available to us for inclusion in our database.

114-25 Seasonal restrictions on critical elk and deer winter ranges would not be required if animals were not present on the site (Page 2.35). For short-term activities this would be acceptable. However, for long-term activities, we are concerned with this statement. Although animals may not be present one year, if an area is designated as critical winter habitat, then use has occurred in the past and is likely to occur in the future. Allowing activities with long-term impacts could cause big game animals to be displaced into poor quality habitat.

114-26 While surface-disturbing activities and OHV use are not allowed within sage grouse buffer zones, grazing is allowed (Page 2.36). Seasonal restrictions of grazing within the outlined buffer zones from March 1 to June 30 should be considered. Guidelines adopted by DWR, BLM, and USFS state that a two-mile buffer zone be established around sage grouse leks and protected from vegetative treatments. Sage grouse populations and habitat are declining. This species provides unique hunting and viewing opportunities and critical habitats, such as leks and nesting areas, need to be protected.

114-27 In order for adequate habitat to be maintained for possible bighorn sheep reintroduction, domestic sheep must be excluded from these areas. Disease is a major contributor to declines in bighorn sheep populations. BLM must make a serious effort to eliminate domestic sheep in bighorn habitat by changing classes of livestock or exchanging grazing permits, or retiring permits (Page 2.40). DWR should be involved in negotiations and kept informed of possible conflicts and alternatives.

114-28 Increased vehicular access as outlined on Page 2.41 presents some negative impacts on wildlife. Many studies have shown that increased use by improving access causes many wildlife species to abandon the area. Species particularly sensitive to such disturbance include black bears, cougars, raptors, bighorn sheep, and elk. We would suggest that

114-24 Refer to our response 8-11.

114-25 Refer to our response 8-12.

114-26 Refer to our response 8-13.

114-27 Refer to our response 8-14.

114-28 Refer to our response 8-15.

114-28 Cont. access improvements concentrate on horse, foot, and bicycle trails. This could reduce impacts to wildlife.

114-29 In addition to the road restrictions placed on OHV on Page 2.50, seasonal restrictions outlined for wildlife should be applied to OHVs in areas critical to wildlife such as leks, nesting areas, wintering areas, and fawning and calving areas.

114-30 DWR should be consulted during analysis of cases involving the harvest of ponderosa pine, aspen, cottonwood, and other large conifers as outlined on Page 2.62.

114-31 Regardless of which alternative is chosen, guidelines for seasonal restrictions and buffer zones for the protection of important wildlife species should be followed. These restrictions would apply if the species is present in the area. Clarification of these guidelines follows:

Seasonal restrictions -

Mule deer	12/1 - 4/15 and 5/15 - 7/5
Elk	12/1 - 4/15 and 5/15 - 7/5
Antelope	5/1 - 6/30
Goshawks	4/1 - 7/20
Ferruginous hawks	3/1 - 6/15
Golden eagles	2/1 - 7/15
Peregrine falcons	2/1 - 8/31
Prairie falcons	4/1 - 7/15
Sage grouse	3/15 - 6/30

Buffer zones -

Peregrine falcons	1 mile
Bald eagles	1 mile
Other raptors	0.5 mile
Bighorn sheep	0.5 mile from canyon rims and talus slopes

114-32 There are several statements to the effect that restrictions can be waived following site specific analysis which receive a "no effect" or "no practical alternative" result. DWR would like to be involved with and informed of such analyses in order to determine the effects on wildlife before restrictions are waived.

114-33 The following species are listed as sensitive by the state of Utah and potentially occur in the DRMA. Actions which could potentially have negative effects on these species must either be considered, steps taken to minimize impacts, or mitigated for losses. These species include:

Dwarf shrew	Purple martin
Red bat	Utah milk snake
Spotted bat	

114-29 Refer to our response 8-16.

114-30 Refer to our response 8-17.

114-31 Refer to our response 8-18.

114-32 Refer to our response 8-19.

114-33 Refer to our response 8-20.

114-34 Proposed decisions on Page 2.35 suggest bear baiting be allowed by permit only in Alternatives A, C, and D. Alternatives B and E indicate that bear baiting permits will not be issued. The DWR is opposed to not issuing bear baiting permits. Our stand indicates that bear baiting is an acceptable method of hunting bears, as outlined in our cougar and bear hunting regulations. The methods of taking are under the jurisdiction of the Utah Wildlife Board.

Bear harvest rates are regulated by totally limited permit numbers. Baiting, which is only permitted when the bears are harvested with archery tackle, is an important method of allowing archers to get close enough to harvest a bear. If archers weren't allowed to hunt over baits, using dogs would be the only practical method of harvest. Not all archers choose to utilize dogs.

If cleanup of the bait site is the issue, the BLM certainly has the responsibility and prerogative to regulate this potential problem. Bear bait sites are like oil drilling sites, firewood sales, and other activities where humans can affect the environment. Like these other activities, satisfactory cleanup stipulations should be incorporated into the permit and enforced.

114-35 DWR appreciates the wildlife stipulations identified and proposed in Appendix 2. All of these stipulations are considered essential to effective management of wildlife and mitigation of impacts.

114-36 Management guidelines identified for black-footed ferrets on Page A2.11 indicate that Alternatives A & E would continue to support DWR hunting regulations as they apply to prairie dogs. This should also be applied to Alternative B.

114-37 The Division of Wildlife Resources would like to review and comment on the final Resource Management Plan and Environmental Impact Statement. If questions arise, please contact the appropriate Regional Habitat Managers. They are Clay Perschon and Ken Phippen for the Northeastern and Southeastern regions, respectively.

Division of Oil, Gas, and Mining

From our review of the RMP/EIS, it is obvious that a great deal of effort and craftsmanship has been employed in its development. Furthermore, our field trip to the area with the EIS team was helpful in understanding the complex issues involved.

There are, however, two areas in the scheme of the planning effort with which we take issue and feel deserve comment. One issue concerns the use of "No Surface Occupancy" (N.S.O.) as a lease stipulation, the other is in how the RMP/EIS will affect solid minerals development and use.

114-34 We agree, UDWR does control the method of taking. However, the proposed decision would not allow the issuance of bear baiting permits due to the potential public health hazard and conflicts with recreational users. Please refer to our response 70-3.

114-35 Thank you for your support.

114-36 Thank you for your comment.

114-37 UDWR will receive copies of this document.

Penelope Smalley
March 26, 1992
Page 10

No Surface Occupancy

The use of no surface occupancy appears to be a stipulation which is used to replace careful management of juxtaposed resource uses. Further, the RMP/EIS does not contain any technical analysis as to whether N.S.O., as a lease stipulation, enables a lessee to, when used, actually recover minerals under a lease. Currently, 8%, or 66,000 acres of the resource area is categorized as N.S.O. (Page 3.29) for Oil and Gas Development. Under Alternative "E", the preferred alternative, this amount would increase to about 12% of the resource area, or 90,100 acres (Page 2.47). Without an analysis or a presentation of the technical feasibility of how possible oil or gas drilling and recovery may occur under N.S.O. stipulations, an analysis of cumulative impacts (as is presented on page 4.61 for Alternative E) is not possible.

114-38 One solution to the lack of this technical analysis would be to include it in the document. As an alternative, however, rethinking the compatibility of uses and the timing of certain uses may be a more efficient and effective way to approach the dilemma.

As an example, N.S.O. is proposed as a lease stipulation for all level 1 and 2 lands in the Brown's Park Complex. The exact acreage involved is uncertain, as the calculated amount of winter range required. Since the Brown's Park Complex contains crucial deer and elk winter range, special consideration is warranted in this area. Therefore, considerations such as timing of drilling activity, the site specific nature of drilling activity, and the concept of drilling which, which requires specialized mitigation, should be utilized in place of no surface occupancy applying to the complex as a whole.

This same creative approach should also be examined as an alternative to applying an N.S.O. lease restriction in the 18,300 acres of potential black-footed ferret habitat. These areas with potential for ferret reintroduction will have significant negative impacts on seven percent of the high potential oil and gas areas in the Myton Bench - Nine Mile Canyon and Horseshoe Bend - Ashley Valley oil and gas regions. (Page 4.67 Alternative E Impacts). The Pariette Wetlands are listed as an area which require special emphasis in management as an A.C.E.C. Instead of applying the blanket N.S.O. stipulation to level 1 and 2 lands, these areas in Pariette Wetlands should be designated as places where special stipulations would be applied to drilling activity or development.

Solid Minerals

114-39 Tar sands development and use would be precluded under the application of Alternative E, due to the Pariette STSA's designation as level 2 land. While we can understand the need for protection of the Pariette Wetlands, it appears that the use of currently available reclamation technology needs to be examined as part of the alternative. Given the opportunity for special lease stipulations requiring land reclamation, precluding the development of asphaltic materials is not warranted.

114-38 Upon review of the extent of lands with NSO stipulations in the proposed RMP category map, and current horizontal drilling technology, it is concluded that NSO stipulations overall do not significantly impact the technical feasibility of extracting oil and gas resources.

The NSO stipulations proposed in the proposed RMP are not "blanket" in nature and are described below for the Brown's Park Complex, the black-footed ferret reintroduction area (Eight Mile Flat), and the Pariette Wetlands areas. We believe current technology involving horizontal drilling could be used successfully in these areas to access oil and gas from adjacent non-BLM administered surface lands (e.g., state or private lands).

In the proposed final RMP, NSO stipulations concerning crucial deer winter habitat in the Browns Park Complex would be applied only to the crucial sagebrush vegetation type and is not a blanket stipulation (please refer to Appendix 4).

In the proposed RMP reintroduction of the black-footed ferret is proposed only at one site (Eight Mile Flat). The area will not be covered by NSO stipulations either prior to or after reintroduction. Rather prior to reintroduction the area will fall under a lease notice (see Appendix 4) and following reintroduction a controlled surface use stipulation (see Appendix 4).

The NSO stipulations which will apply in the Pariette Wetlands ACEC are outlined in Appendix 4 and are for: Special status plant species, and goose nest sites. These are specific stipulations applied to specific areas and are therefore not blanket NSO stipulations.

114-39 The decision involving tar sands has been modified in the proposed plan. Please refer to Table 2-15.

114-40 In another solid mineral area, phosphate, Alternative E, appears to address the potential opportunity to develop the preference right leases (6,650 acres) in a manner which is preferable to the other alternatives. The opportunity to use specific restrictions to minimize adverse impacts to crucial deer winter habitat (Page 4.56) is indicative that this technique can be used in other areas, i.e. Brown's Park.

Summary of DOGM's Position

114-41 The planning employed in the Diamond Mountain Resource Area is complex and, we trust, a dynamic process. If the planning team would examine the parts of the RMP/EIS which we have noted above, the use of no surface occupancy lease stipulations, and the use of site reclamation as a mitigation tool, the plan would better address minerals management from our perspective. We encourage the BLM to be creative in its approach to using special lease stipulations, at both the leasing and minerals development stages. If there is a need for further clarification of the Division's comments, we will be glad to discuss them with the RMP/EIS team.

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Utah State Clearinghouse at the above address, or call Carolyn Wright at (801) 538-1535 or John Harja at (801) 538-1559.

Sincerely,

Brad T. Barber
State Planning Coordinator

BTB/rpj

114-40 As discussed in our response 114-38 above, the proposed NSO stipulation is not a "blanket" stipulation, but applies only to the sagebrush vegetation communities in Browns Park. Cooperative studies with UDWR have documented significant numbers of deer from four herd units traveling up to 70 miles to winter in the confines of the park. We believe this data supports the crucial nature of this community, thus resulting in the NSO stipulation. We do not have sufficient data to support such a restriction on the crucial deer winter range on the much larger southern slope of the Uintas. Also the exploration and development methodologies of oil and gas and phosphate recovery are significantly different. We believe it is appropriate at this time to recommend only special restrictions to future phosphate development, not NSO stipulations on the south slope of the Uintas.

114-41 Please refer to our response 114-38 above.

1610
1782

TO: Vernal District Manager

At our meeting of March 17, 1992, the Vernal District Advisory Council reviewed and discussed the Diamond Mountain Resource Management Plan. Following a straw vote that indicated five votes for Alternative A and five votes for Alternative E, The Council passed a resolution as follows:

That the Bureau of Land Management recognize that the Council did not pass a specific resolution on any of the alternatives because none received support of a majority of the Council members. However, the Council requests that as the final Resource Management Plan is completed, that the Bureau consider the concerns expressed by individual members as recorded in the minutes of the meeting.

These concerns are briefly summarized as:

1. Alternative E best manages riparian areas.

116-1 2. On page 4.23, there was an objection to the use of the word "insignificant" in describing the importance of the livestock industry.

116-2 3. The RMP should address what would happen if there were feral horses discovered on BLM lands in the Resource Area.

116-3 4. Consider the affect of wildlife grazing in riparian areas.

116-4 5. On page 2.31 the section on vegetation treatment does not say anything about chemical treatment in Alternative E. There should be some chemical treatment, particularly of weeds.

116-5 6. On page 8.25 the totals on vegetation treatment are not correct.

116-6 7. On page 4.54, there was a question as to whether a citation of "Bangerter" is a proper source of data for wildlife values.

116-7 8. On page 4.54, there was a question as to whether the $9.19 figure for an AUM was properly used in describing the value of an AUM to the local economy. There may be more current data from the University extension that indicates a value more like $25 per AUM.

116-8 9. There may be new data from University extension that shows there is no need for a buffer between domestic sheep and wild big horn sheep.

116-9 10. On page 2.35, bear baiting is eliminated. This is an emotional issue and any decision should be based on wildlife needs.

RESPONSE TO COMMENT LETTER 116 (VERNAL DISTRICT ADVISORY COUNCIL, Beers)

116-1 Utah's beef industry does not represent a significant portion of the Nation's beef production when viewed from a national point of view. However, locally it is significant as indicated in the socioeconomic section of Chapter 4. Also please refer to our response 104-2.

116-2 Please refer to Chapter 2 dealing with wild horses. In the proposed plan DMRA recommends the Range Creek Herd Management Area Boundary be adjusted to exclude that portion of the herd management area within DMRA. No other wild horse herd management areas will be designated. Any feral/wild horses detected within DMRA will be subject to the provisions of the Wild Horse and Burro Act or to the estray laws, as applicable. Until the recommendation has been accepted, DMRA will continue to provide 49 AUMs for wild horses in this HMA.

116-3 As stated in Chapter 4 under impacts to riparian habitat: "Allowing wildlife forage to increase for wildlife use up to 67 percent from present forage use levels could cause unacceptable use on riparian areas, especially during drought years when wildlife would concentrate in wet areas." Significant impacts to riparian by implementing the proposed plan is not expected; however, as part of Standard Operating Procedures outlined in Chapter 2 for Vegetation Resources, it states: "Temporary adjustments in use due to effects of drought would be made to livestock and wildlife as shown by monitoring."

116-4 Please refer to Chapter 2 management common to the proposed plan and all alternatives for vegetation. For the proposed plan chemical treatment is one alternative method allowed for the proper management of the vegetation resource.

116-5 Thank you for your attention; the correction has been made to the Table A8-4.

116-6 The citation has been corrected to USF&WS, 1985; please refer to the reference section.

116-7 Please refer to the clarified discussion of socioeconomics in Chapter 3.

116-8 The majority of current data would suggest the need for a buffer between domestic and bighorn sheep. Such a buffer would protect both species

116-9 Cont. Consideration of whether to allow bear baiting is inappropriate in a planning document. Stick with Alternative A which would allow continuation of bear baiting.

116-10 11. No alternative addresses surface disturbing mining strongly enough, particularly phosphate mining in the Dry Fork/Red Mountain area.

116-11 12. Allow no reintroduction of black footed ferrets.

116-12 13. Leave the Red Mountain area open to off road vehicle use.

Signature: _____ Date: 3/30/92

Randy Beers
Council Chairperson

from possible transmission of harmful pests and disease. Please refer to our response 110-10.

116-9 Please refer to our response 70-3.

116-10 Please refer to our response 114-1.

116-11 Thank you for your comment. Please refer to our response 90-1 concerning black-footed ferret reintroductions.

116-12 Please refer to our response 13-1.

(1)

To: Ron Truogstad
Diamond Mtn. R.A. Manager
170 So. 500 E.
Vernal, UT 84078

From: Scott Williams
692 Nell St
S.L.C. UT 84103

Please send copy of the draft EIS to this address

Dear Ron,

It has been brought to my attention that BLM has released its Draft EIS ~~for the~~ and RMP for Diamond Mountain Area. I would like a copy of this document, as management of this area is of great concern to me. I have spent much time, as a Utah native, enjoying the wildlife and Indian heritage of this area, and I know it well. It contains important habitat for rare and endangered wildlife, as well as potential for reintroduction of such wildlife. Visits to the area have used

(2)

my concern, as I have witnessed adverse effects of grazing, ORV, and other activities. I would like a chance, as an affected member of the public, to play a part in considerations for future management of this area. I have been briefed on the current draft document, and it sounds as though alternative B may have some promising ideas. But without the opportunity to view the document, I cannot be as specific as I would like.

If, for some reason, I cannot obtain a copy of the EIS from you, please note the following comments on future management of this area:

117-1 - Any alternative that would allow any bear baiting is absolutely intolerable.

117-2 - Reintroduction of wildlife, incl. the black-footed ferret, should be a high priority.

117-1 Please refer to our response 70-3.

117-2 Thank you for your support.

(3)

117-3 — Considering recent events both nationally and especially in the West, and NEPA document that fails to offer a full range of alternatives related to grazing — INCLUDING A "NO GRAZING ALTERNATIVE — is surely inappropriate, and probably illegal.

117-4 — ACEC and Scenic River designations are crucial to this already highly fragmented area.

117-5 — ORV use should be eliminated or limited to existing ROADS only.

I will respond in greater deal after I have the opportunity to review the draft EIS. Thank you for your cooperation and consideration.

Sincerely,

Scott Williams

Scott Williams

117-3 FLPMA, section 102, states that public lands be managed in a manner that will provide food and habitat for fish and wildlife and domestic animals. Livestock grazing is considered a "principal or major" use on public lands along with fish and wildlife development and utilization, mineral exploration and production, rights-of-way, outdoor recreation, and timber production. Although different amounts of acreage would be closed to livestock grazing by alternative, a no-grazing alternative is considered unnecessary and counter productive to solving resource problems. There is a range of alternatives for forage allocation. Please refer to Table 2-15 for vegetation allocations for the proposed plan and each alternative.

117-4 Thank you for your comment.

117-5 Restrictions are placed on OHV use to protect sensitive are as that could be damaged if use was allowed to proceed without limitations. Individual RMP team members identified these sensitive areas and the needed limitations to OHVs. Areas that were identified as nonsensitive to OHV remain open to such use. BLM cannot limit OHV use without a good reason.

March 26, 1992

Dear Mr. Troastel:

This is in response to the BLM's proposed alternatives re: the Diamond Mountain Resource Management Plan.

It would be appreciated if you would consider the following modifications to Alternatives "B" and "E":

118-1 (1) All the Browns Park Complex ACECs and the Nine Mile Canyon ACEC should be closed to mineral entry.

118-2 (2) All the critical category 1 and 2 lands should be closed to mineral leasing including the Ouray National Wildlife Refuge and not merely leased with no surface occupancy stipulations.

118-3 (3) All of Diamond Mountain should be closed to mineral development.

118-4 (4) All ACECs and Wild and Scenic Rivers should be closed to mineral development and ORV use except on existing and designated roads. The entire length of the Green River in the Resource Area should be protected as a critical habitat/travel corridor.

118-5

RESPONSE TO COMMENT LETTER 118 (BERNARD)

118-1 Please refer to the Summary of this document for a discussion of the management priority area concept. Chapter 2 provides a detailed list of the management levels and the resource values assigned for the proposed plan and each alternative. We believe it would be counter productive to close the entire Browns Park Complex and Nine Mile Canyon to mineral entry.

118-2 BLM-administered mineral estate would only be closed to leasing when it is determined that other land uses or resource values cannot be adequately protected even with the most restrictive lease stipulations and that appropriate protection can only be ensured by closing the lands to leasing.

118-3 Please refer to our response 118-2, above.

118-4 We agree that ACECs and rivers proposed for designation as wild and scenic rives need special protection. Each of these areas possess certain values that make them special. We identify these values and propose management of these areas to protect these special values. If we feel protection requires closing an area to mineral leasing or restricting OHV use to designated roads and trails, that is what we do. Using this method we often find that ACECs and rivers proposed for wild and scenic designation can be managed using a variety of management practices. That is why some areas in an ACEC, for example, may be closed to mineral leasing and OHV use, while other areas can accommodate both uses with no adverse affects.

118-5 The entire length of the Green River that flows through the resource area was evaluated for possible wild and scenic river designation (see Appendix 7). Based on this evaluation and public comment it was determined to drop the section between Dinosaur National Monument and the public land boundary north of Ouray from further study in the proposed plan. The remainder of the Green River was brought forward in the proposed plan for possible designation in the Wild and Scenic River System.

-2-

118-5 Cont. and studied for Wild and Scenic River status.

118-6 (5) All riparian areas should be closed to OHV use.

118-7 (6) BLM should consolidate land holdings on Diamond Mountain, and not further confuse land ownership patterns by trade.

Thank you.

Sincerely,

Bonnie Bernard
2060 East 4800 South
Salt Lake City, Utah 84117

118-6 We believe it is unnecessary to close all riparian areas to OHV use in the proposed plan to maintain or improve riparian conditions. Although intensive OHV use in riparian areas can be damaging, many riparian areas in the resource area receive very little OHV use currently, and most likely will not receive heavy use over the life of the plan. However, riparian areas in the proposed plan that would receive special consideration are the upper Green River segment in Browns Park and Pariette Wetlands. In these areas, OHV use would be limited to designated roads and trails. The upper Green River is getting increased OHV use, while Pariette is an important waterfowl nesting area. Refer to the Utah State Riparian Policy in Appendix A6.1. In Alternative B, OHV use would not be allowed within 700 feet of riparian areas.

118-7 Please refer to Chapter 2, management common to the proposed plan and all alternatives, for lands and realty management regarding land ownership adjustments.

March 30, 1992

Dear Ms. Smalley:

167-1 This is my comment in regard to the draft Diamond Mountain Resource Management Plan. Of the five alternatives, I prefer "B." It comes closest to managing the resource area with biodiversity in mind, which is the key to the type of management that will promote the long term health and stability of the land. I especially like its emphasis on endangered species protection, ferret reintroduction, Wild and Scenic Status for the Green River, greater care in managing the Browns Park area, foot access to Ashley Gorge, and protection of Red Mountain, Dry Fork canyon, and of the slickrock areas above Red Fleet. However, there still isn't enough emphasis on enforcement, and the document's socioeconomic categories are appalling--they label anyone in
167-2 favor of careful use of the land as a "young newcomer" and reserve the title of "worker" only for those who favor exploitive use of the earth. That is extremely offensive and very inaccurate. One other general observation regards bear baiting; this lazy person's way of hunting, like hounding,
167-3 shouldn't be allowed on public land.

167-4 It may well be that you'll end up choosing alternative E. If so, please modify it by incorporating the Uintah Mountain Club's proposed changes. These proposals, which I was involved in formulating, are definitely not of the let's-ask-for-a lot-more-than-we-want-and-hope-we-end-up-getting-exactly-what-we-want variety. They are an attempt by a variety of people to compromise and come up with a solid proposal that should need no further dilution. If anything, they don't go far enough toward promoting biodiversity and nondestructive recreation.

167-5 My main concern with the RMP involves the Red Mountain area. *No* alternative adequately protects this area. All of Red Mountain, as well as the slickrock extending eastward into the rock formations north of Red Fleet reservoir and westward across the bottom of Taylor Mountain and up into Dry Fork Canyon, should be protected not just as an ACEC, but by level one management. *The Red Mountain area should be protected as a semi-primitive, nonmotorized area!* Additionally, it should get VRM class one designation. This area meets the criteria for such management, it deserves it, and it should have it! (Actually, it should have been designated a wilderness study area and included in the BLM's wilderness proposal). It is important to the maintaining of the integrity of the area that the BLM acquire sections 16 and 2 on Red Mountain, especially 16, and include them in this overall management plan. Also, as much surrounding area as possible should receive level two management.

From forest to year-round riparian areas to slickrock, Red Mountain has a diversity of life and landforms. This area has the finest scenic values of any spot in northeastern Utah. The geological outcrops, pinnacles, and fins, the red uplift, the large arch, and the relict vegetation community make this both a scenic and an educational and scientific area of value (and it is utilized by local teachers). It is also very valuable for wildlife forage. There are a number of areas that are potential habitat for endangered species; they should be checked for the possible presence of such species, and for suitability for reintroducing species. Also, it is part of a high density archaeological/paleontological area, and is know to have ancient cultural sites and art. Two other values are important and interrelated--watershed and recreation. This area is not only very beautiful, it is very fragile. Much, probably most of the soils on the lower half of the mountain are cryptogamic. Motorized recreation is destroying those soils. Steinaker Draw is showing the effects of this erosion, with sediment washing through deep channels into Steinaker Reservoir much more rapidly than it should. This would not happen if the mountain were protected for its multiplicity of values. Designating it a nonmotorized area would preserve the watershed and allow for outstanding opportunities for solitude in a wondrous setting just a few miles from Vernal. The area will lose most of its values in proportion to its use by OHV riders.

RESPONSE TO COMMENT LETTER 167 (WAKE)

167-1 Thank you for your support.

167-2 The socioeconomics portions of the document have been substantially reworked. Please refer to our response 103-5.

167-3 Please refer to our response 70-3.

167-4 Please refer to our responses 103 (UMC, Borton) and 228 (UMC, Durrant) for our specific responses to the Uintah Mountain Club's comments.

167-5 Please refer to our response 79-2.

I understand that the OHV users are very much in favor of Alternative A. I am in fairly close contact with a few of these individuals and am dismayed by their attitude, which is basically that they should be allowed to ride wherever they want, and that any area that might be closed to them should immediately be fought for regardless of its other possible uses. They justify their activities in part by claiming that the weather washes away signs of their passage. This is definitely not true of Red Mountain. I have photographic and video evidence which the BLM is welcome to of long term damage that has been done to this area by OHVs. There are eroding ruts, tire-blackened slickrock, litter, and vandalism through much of the area accessible to vehicles (and vehicles have tried to get to all of it). Please keep in mind that you have an obligation to protect a variety of values, and to promote a variety of uses of public land including quiet, nondestructive uses. This area's values do not involve grazing, mining, or other economic activities, they involve aesthetic, biological and other values as noted above, values that are not compatible with motorized vehicles. There are many other areas to ride in. For example, the "sand hills" north of Steinaker Reservoir are used by OHVs a lot more than the mountain itself, and could be left open for their use (the Uintah Mountain Club's proposed boundary for the lower part of the Red Mountain ACEC deliberately avoids this area). Red Mountain should be protected, and designated for walk-in recreational use only. In keeping with this, even mountain bikes and rock climbers drilling in fixed protection should be prohibited.

167-5 Cont.

In conclusion, I ask you to consider that the economic, physical, and mental health of the people of the Uintah Basin will be best served over the long run by keeping intact the web of life that we are a strand in. Emphasize biodiversity in your final plan and forgo short-term economic projects that do long-term environmental damage, in favor of a stable, earth-friendly plan. You included a quote on conservation by Aldo Leopold at the beginning of the draft RMP/EIS. Please keep in mind the quote that perhaps best sums up that great man's philosophy: *"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."* Thank you for you consideration of my views.

Sincerely,

Paul Wake

Paul Wake

848 W. 400 S.
Vernal, UT 84078
789-8235

Dinaland Snowmobile Club

Vernal, Utah 84078

February 22, 1992

Bureau of Land Management
District Office
170 South 500 East
Vernal, Utah 84078

Dear B.L.M.:

Here are brief comments regarding the Diamond Mt., Red Mt. and Dry Fork Management Plan Proposal:

168-1 1. The plan is difficult to interpret for the layman. If pubic input was the intent, then the language would discourage this. Un-necessary word and idea abbreviations, and the use of scientific terms, serve no purpose for encouraging input from the average citizen.

168-2 2. No single alternative is acceptable; there are none that allows continued use of Red Mountain by RHVs on existing expert and novice trail systems.

168-3 3. While we are all environmentally conscious, the plan belabors environmental concerns and almost completely ignores most recreational use and economic values of areas.

168-4 4. Specifically, we would like Red Mountain to remain open for use as is with no restrictions unless irresponsible damaging is caused and can be authenticated. This means keeping the present major trail open for OHVs and the expert trailing systems left open.

168-5 5. Because snowmobiles can travel is areas and create no environmental impact, they should be given more latitude rather than be confine to the RHV category.

Thank you for accepting these comment.

Sincerely Yours,

Don Hatch

Don Hatch
Executive Director

RESPONSE TO COMMENT LETTER 168 (DINALAND SNOWMOBILE CLUB, Hatch)

168-1 We are sorry you found the draft document difficult to interpret. The summary section immediately preceding the Table of Contents was intended to help the reader understand the document's format and ease in its review. To the extent practical, without losing the desired intent, the use of government "jargon" and scientific terms were kept to a minimum. The glossary has a complete list of abbreviations, key words and phrases used in this document and their definitions.

168-2 Please refer to our response 10-1.

168-3 We feel the proposed plan addresses a wide range of recreation uses on public lands in the resource area.

168-4 Please refer to our responses 10-1 and 70-1.

168-5 The reason for most restrictions to OHV use during winter months is to protect deer and elk on their crucial winter habitats. Impacts from snowmobile use in these areas are considered to be similar to wheeled OHV impacts relative to wildlife disturbance and displacement. In the proposed plan there are many areas in the resource area where snowmobiles can travel with no restrictions. At the elevations of crucial big game winter habitat, normally snow accumulations are low enough to prevent snowmobile use. However in winters of heavy snow accumulations, enhancing snowmobile use in these areas, are also winters of extreme stress to big game and snowmobile use would increase big game disturbance and displacement.

NOTE: An alternative proposal and petitions with approximately 560 signatures was submitted with Mr. Hatch's letter. The exact wording of the petition is:

In reference to the Diamond Mountain resource area RMP/EIS, we as concerned citizens of the Uintah Basin do not and will not support any of the alternatives as proposed in the RMP/EIS. Furthermore, we strongly recommend B.L.M. to continue with current management policy, ourselves maintaining that alternative A, the so called "No Action" alternative is simply a mere smoke screen which would enable B.L.M. to change management policy at any given time without regard to economical, social, and cultural impacts these changes would have on local citizens. Our deepest concerns are the nomination of the Dry Fork Red Mountain area as ACEC.

(revised)

THIS DOCUMENT IS SUBMITTED BY THE DINALAND SNOWMOBILE CLUB AND THE COALITION FOR RESPONSIBLE OHV USE. BOTH ORGANIZATIONS ARE LOCATED IN VERNAL, UTAH. ADDITIONAL SUPPORT IS, OR WILL BE FORTH-COMING FROM THE BLUE RIBBON COALITION, A NATIONAL ORGANIZATION FOR "SENSIBLE USE" OF PUBLIC LANDS.

SINCE THIS DOCUMENT HAS BEEN REVISED, WE NOTE AT A LATER DATE THAT THE TRAILING SYSTEM CREATED BY EXPERT BIKERS SHOW LITTLE OR NO EVIDENCE OF USE. THE TRAILING ESSENTIALLY FOLLOWS EXISTING GAME TRAILS. IMPACTS ARE ERASED ON AN ANNUAL BASIS BY NATURAL ELEMENTS OF WIND, WATER AND RAIN. EXCEPT FOR THE USERS -- THE EXPERT BIKERS -- NO ONE SEES NOR KNOWS OF THESE TRAILS. THIS IS A POSITIVE TESTIMONY FOR THEIR CONTINUED USE.

For the sake of brevity only, neither this proposal nor the petition signature sheets are duplicated in this document. They are available for public review in the Vernal District Office.

A proposal to allow continued OHV use of Red Mountain, to exclude it from RNA status, and to submit it as in-put for consideration toward the Diamond Mountain resource area RMP/EIS.

Descriptive Location

Red Mountain is located nine miles north of Vernal, Utah. It falls adjacent to the Steinaker Reservoir boundary on the southeast, is bound on the west by the dirt Taylor Mountain road, and is adjacent on the north to the Chevron Resource, (Simplot) phosphate operation. It contains approximately 1972 acres. The location is unique because:

1. It is a recreational area close to Vernal.

2. The rugged physical features offers not only beauty and solitude, but is compatible with ORV travel on the already existing major trail and minor expert class RV trailings.

3. Non-discernible expert trails are generally confined to the east side; a single trail goes from the north rim to Taylor Mountain Road.

4. Outstanding geological features display brilliant red moenkopi formation in sharp constrast to shinarump mowrey sandstone. The Red Mountain summit contains ponderosa pine, but indications show harvest that took place in the late 1800s and early 1900s.

5. While the mountain is extensively used by RVs, hikers horses, and lately mountain bikes, the remainder of mountain is pristine in nature. While other trails have been used over the years, these do not show.

6. Evidence of displacements by man is manifest in tree stumps, poles shoring up the main trail; wagon tracks that are cut into the sandstone.

Historical Past

When Ashley town was settled in the area north of Vernal in the late 1800s, much construction was necessary. Timber was hauled from the Ashley National Forest as well as posts from the south slopes of the Uintas. Wagon trails made patterns across, up and down these slopes; some can still be seen today.

But different from all of this was the unique and beautiful Red Mountain consisting of 1972 acres. Here was a source of close timber - the mighty ponderosa. Hence, a wagon road was laboriously carved from the southwest sector upward about two miles to the summit. A second and connecting road was constructed by hand, down the east slope, across ravens and along precarious, narrow sandstone slopes. Over this the pioneers pulled their wagons loaded with logs. Destination was Ashley town where building was taking place.

Soon the sensibility of hauling timber from Red Mountain waned. The better trees were gone and what few remained were not worth the effort.

But a use pattern was set. Families from Vernal still visited the area by horseback, hiking and with old model ford cars. The same old wagon trail was used since it was the only trail and the only way to get up and back. Occasionally entire wagons full of kids frequented the mountain -- the young and the old. To this day the pattern continues except access, instead of by wagon, is by OHVs, hiking and again, horses. So we have had, over a period of about seventy years, an established and non-conflicting type of recreational use.

We do not want this use pattern to change. Additionally, other OHV trails are used with <u>no apparent impact</u> on Red Mountain proper. There is ample evidence that the area has, in fact <u>rejuvenated</u> from a period of intense use and construction to it's present condition of a most pleasant place and an <u>all around</u>, diversified recreation area. To re-designate or to "fix it when it works" idea, does not make sense. <u>Management</u>, <u>not</u> <u>closure</u> to the many recreational opportunities, is the answer.

ENVIRONMENTAL IMPACT

Since Red Mountain is a remnant of the Uinta Mountain system, and it's prominence is the result of hard Shinarup formation protecting the red moenkopi, the resulting system is striking in that it all stands alone to the south of the main range. The tough exterior offers little chance for tender, perennial plant growth... Likewise, growth is not possible for many of these kinds of plants because of a lack of water. Therefor, ORV travel is possible with minimum or no impact. It also should be noted that "No endangered, threatened or sensitive animal species are known to occur on Red Mountain", according to J. S. Tuly, "Red Mountain Research Natural Area". Animal displacement is minimal or non-existent since there is no sustaining water, and a lack of dependable food.

Of significance is the fact that the Shinarup formation is greatly exposed, especially along the southeast slopes. Along the upper stretches it provides a hard surface that shows little or no impact from R.V.s. Other than the main trail, no impact from R.V.s is found because of the hard surfaced terrain even though other trails and areas are used. It is recommended that this use continue, but certainly monitoring for damage should be in order.

The present rough trail systems make it possible for one to leave the trails and hike to various spur areas which over-look the gulleys and draws. The panorama is breath-taking to both the north and west. To the east and southeast, a rugged and expert RV set of trails are offered on the slick Shinarup sandstone. There is little or no evidence of these trails because of annual weather cleansing. One would say that nature's natural elements, wind, water, rain, ice and snow re-arranges the landscape and keeps it in a natural form by obliterating tracks left by animals and RVs alike...Finally, the trail systems provide a wide range of human recreational needs for both the expert, the young, the old, handicapped and even the blind. This is and can be a place for everyone with each finding his or her degree of solitude considering diversity of areas.

To further substantiate the above claims, I again quote the J. S. Tuhy study wherein he states, "Soils appear to be shallow and considerable bare sandstone is exposed in many of the locations beneath the pine". This barren condition is even more pronounced over the entire surface of Red Mountain except to the extreme south. From the above we can conclude that ORV's have little or no impact on Red Mountain. Because of this, and the fact that more people can enjoy Red Red Mountain when it is not designated (43 CFR 8223), or locked in to the present proposed management plan, leads to the belief that Red Mountain should remain used as is.

Recreational and Economic Needs

At the present time, Red Mountain's biggest asset is recreation. Management should point to this and allow a wide and diversified kind of recreational activities. Considering the area, a great variety of recreational activities are possible. In this respect the mountain is uniquely different from most. There is no reason that hiking, biking, picnicing, ORV use, horseback riding, can't all exist side by side in this fine area. As mentioned, the variety of trails makes it possible to find solitude as well as experience group education and instructive activities. Few places can afford this. Red Mountain can.

The State of Utah is in an economic crisis, and particularly is it shown in Vernal, Utah. Because the extraction industries are now dormant, recreation comes to the fore-front as a viable economic factor. Recreation is big business, for it affords over 2 billion dollars to Utah's annual economy... The industry is the fastest growing,and ranks second in the State (Utah Travel Council, 1986). Red Mountain can become a part of this industry with careful and sensitive management -- management which will suffice rather than closures and limitations.

J. S. Tuhy suggests in his paper of March 17th, 1987, that the resources of Red Mountain are probably insignificant to the social and economic bases of Uintah County. RNA/ACEC designation should have not effect, positive or negative, on revenue". THIS COULDN'T BE FARTHER FROM THE TRUTH!!. The same might be said about river trips in this area that now bring over 2 million dollars annually to this area's economy. Recreation? Yes. It continues to amaze me how Mr.Tuhy's (Nature Conservancy)single trip on foot on to Red Mountain, has lead him to so many conclusion -- all supporting a single biased view. He may have spent a week or two; natives here have spent a lifetime of use and study.

TO-BLM
VERNAL DISTRICT OFFICE
170S. 500E
VERNAL UT. 84078

FROM-
UTAH FOUR WHEEL DRIVE
ASSOCIATION INC.
WESTON DAVIDSON
LAND USE OFFICER
375S. 100E
LOGAN UTAH 84321
750-2534 W
753-8521 H

RESPONSE TO BLM DRAFT RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT, DIAMOND MOUNTAIN RESOURCE AREA.
1616.10

DEAR SIRS,
WE HAVE FOLLOWED THIS PROCESS FOR SOME TIME, OUR FEELINGS THAT LOCAL PEOPLE SHOULD MAKE THE DECISIONS AFFECTING THE LAND AROUND THEM HAVE LIMITED OUR RESPONSE UNTIL THIS STAGE.

HOWEVER DUE TO REQUESTS AND COMUNICATIONS WITH THE PEOPLE LIVING WITHIN THE AREA, REQUESTS FROM PEOPLE FROM THE AREA, OUR EXPERIENCE WITH REGULATION IN OTHER PARTS OF THE STATE, AND OUR RECREATIONAL USE OF THE AREA, WE MUST NOW ENTER THE DEBATE.

-THIS RESPONSE IS AIMED AT INFORMING THE BLM, AND OTHER DECISION MAKERS OF THE CONCERNES OF CERTAIN LONG-ESTABLISHED USER GROUPS. INCLUDING BUT NOT LIMITED TO; 4 WHEEL DRIVE, MOTORCYCLE, ATV, & SNOWMOBILE USERS,ETC. WHO USE MOTORIZED OR OTHER VEHICLES FOR PERSONAL RECREATION, EXPLORATION, HOBBIES, AS WELL AS OCCUPATIONAL REASONS AND COMMERCIAL PURPOSES.

WE ARE ALSO MEMBERS OF UNITED 4WD ASSOC. AND THE BLUE RIBBON COALITION, THIS RESPONSE WILL BE CONSIDERED AS REPRESENTING THOSE GROUPS AND THEIR MEMBERS AS WELL.

IN GENERAL THOSE PEOPLE WHO HAVE ENJOYED ACCESS TO COMMONLY HELD LANDS BY WHATEVER MODE OF TRANSPORTATION HAS BEEN NORMAL AND CUSTOMARY FOR THE TIME AND ACTIVITY.

-DUE TO POPULATION GROWTH IN THE REGION AND EXTENSIVE LAND CLOSURES AND REGULATION IN OTHER AREAS, THE VALUE OF ACCESS TO LAND WITHIN THE STUDY AREA IS PROJECTED TO INCREASE OVER THE LIFE OF THIS RMP.
ALSO FUNDS DUE TO STATE AND FEDERAL OHV AND TRAIL ACTS WILL CONTINUE TO INCREASE. THESE FACTORS WERE NOT APPEARANT AT THE BEGINING OF THIS PLANNING PROCESS AND MUST BE ADDRESSED BOTH IN THIS MANAGEMENT PLAN AND IN FUTURE BUDGET REQUESTS.

THE SINGLE FORM OF RECREATION WHICH STANDS OUT AS BEING UNIQUE TO BLM LANDS AND UNAVAILABLE ELSEWHERE. IS THE OPPORTUNITY TO EXPLORE AND DISCOVER THE LAND AND WHAT IT HOLDS.

EACH PERSON NEEDS THE OPORTUNITY TO DISCOVER FOR HIM OR HER SELF THE BEAUTY OF THE LAND, IF THEY ARE TO DEVELOPE AN APRECIATION OF IT.
THIS IS A NEED WHICH THE BLM LANDS ARE UNIQUELY ABLE TO FULLFILL, AS THESE LAND HAVE BEEN OPEN TO TRAVEL BY WHATEVER MEANS NORMAL AND CUSTOMARY FOR THE TIME.
THE BLM HAS ENCOURAGED THIS AND WE LOOK FORWARD TO MANY MORE YEARS OF ENJOYING THESE OPPORTUNITIES.

169-1 WE MUST ASK THAT A PROCEDURE, LIKE THAT OF THE FOREST SERVICE, BE INCLUDED IN THIS PLAN AS APROVED, FOR CREATING TRAVEL PLANS TO REGULATE ANY AREA DESIGNATED AS AN EXISTING TRAIL OR DESIGNATED ROUTE AREA.
THE LACK OF PROCEDURE TO ALLOW INTENSE PUBLIC INPUT OR THE FAILURE TO FOLLOW ONE ONCE IN PLACE. WILL RESULT IN CONFLICT AND TIME AND MONEY EXPENSE ALL OUT OF PROPORTION TO THE SAVINGS RESULTING FROM ADMINISTRATIVELY CREATING THOSE PLANS.

WE HAVE REVEWED THE DRAFT MANAGEMENT PLAN AND MADE SOME RECOMENDATIONS. WE ASK THAT THEY BE CONSIDERED.

THE RANKING OF ALTERNATIVES FOLLOWING IS PREDICTABLE. WE WILL ASK FOR THE MOST ACCESS POSSIBLE.

FIRST CHOICE WOULD BE A FORM OF "D" MORE PROTECTIVE OF SOME CRITICAL OR FRAGILE SITES OR A LESS RESTRICTIVE FORM OF "E" OR "A" ALL AREAS HAVE TOO LONG AND EXTENSIVE OF SEASONAL RESTRICTIONS.

"D" SECOND
"A" THIRD
"E" FOURTH
"B" AND "C" NOT ADVISED AS LOST USES OUTWEIGH POTENTIAL BENEFITS AS WRITTEN

169-2 -WE COULD NOT HELP BUT NOTICE THE EXTREME RANGE OF OHV POSSIBILITIES AVAILABLE IN THE DIFFERENT ALTERNATIVES. THIS INDICATES TO US THAT SIGNIFICANT IMPAIRMENT OF OTHER USES IS NOT EXPECTED AS A RESULT OF OHV USE WITHIN THE DMRA.

-THUS WE LOOK FORWARD TO OPEN AND LIBERAL OHV OPPORTUNITIES IN THE FINAL MANAGEMENT PLAN. OUR PREFERENCE WOULD BE AS CLOSE TO "D" AS POSSIBLE AS NOTED.

169-3 - THE UNIFORMITY OF AUM AVAILABILITY FOR GRAZING ACCROSS THE SPECTRUM OF ALTERNATIVES IS ALSO A QUESTION. ESPECIALY AS REGARDS "C" WITH THE RESRTICTIONS ON OTHER USERS AND NO AUM CHANGE.

169-4 THE LAST SECTION OF THIS REPLY IS A LIST OF PREFERED ALTERNATIVES SELECTED FROM THE DIFFERENT ALTERNATIVES.

-THE BODY OF THIS RESPONSE IS ORGANIZED ALONG THE SAME THEMES

RESPONSE TO COMMENT LETTER 169 (UTAH FOUR WHEEL DRIVE ASSOCIATION, INC., Davidson)

169-1 An important part of the RMP process is the development of a travel plan for the resource area. The RMP will include a map identifying all public land in the resource area as being either open, limited, or closed to OHV use. This same map will show roads that will be designated as travel routes during periods of limited use. After the RMP is completed, a larger scale map will be published that will be used as the official resource area travel map.

169-2 The wide range of OHV opportunities in the draft was for analysis purposes. The proposed plan offers a level of OHV use somewhere between the two extremes.

169-3 Alternative B, livestock closures were recommended on municipal watersheds, riparian areas, T&E habitat, and bighorn sheep reintroduction areas. Also to accommodate an increase in wildlife use, livestock reductions would be necessary due to minimal rangeland treatments proposed in this alternative. A 25,292-AUM loss for livestock was analyzed in Chapter 4 but was not shown as an initial reduction in Chapter 2. This has been corrected and now reads: "Establish livestock grazing preference at 25,007 AUMs." The remaining alternatives and the proposed plan would remain initially at 50,299 AUMs due to no initial complete closures affecting existing use. Possible future reductions to livestock from livestock/wildlife conflicts for forage in crucial wildlife habitat could be mitigated by rangeland treatments and management practices. Any AUM losses to livestock due to negotiation to eliminate domestic sheep from proposed bighorn sheep reintroduction areas would occur over time and be done voluntarily by grazing operators through change in class of livestock and alternative grazing systems.

169-4 Thank you for your comments and suggestions.

NOTE: The remainder of Mr. Davidson's comments presents an alternative proposal, selected from the alternatives presented in the draft document. For the sake of brevity only, this proposal is not duplicated in this document. It is available for public review in the Vernal District Office.

169-4 Cont AS THE BLM DRAFT DOCUMENT.

-ATV/OHV/4WD AREAS; WE SUPPORT PROPOSALS TO PROVIDE ATV/OHV/4WD INTENSIVE USE AREAS IN CONVENIENT PROXIMITY TO SERVICES.
THESE AREAS PROVIDE AREAS TO TRAIN YOUNG RIDERS AND PROVIDE IMPORTANT SOURCES OF RECREATION IF SIMPLE OPERATION OF A VEHICLE OR A FAMILY OR GROUP OUTING IS PLANNED.

-PLANNING CRITERIA
-OVERALL CONSIDERATIONS
THE SUCCESS OF THIS PLAN DEPENDS ON THE FAIR AND EQUITABLE APPLICATION OF THESE CRITERIA AND RECOGNITION OF EXISTING RIGHTS AS ENJOYED BY LAND USERS, WHETHER PAST REGULATORY ACTIONS HAVE RESULTED IN SPECIFIC PERMITS AND RESTRICTIONS/RECOGNITION OF THOSE RIGHTS OR NOT.

-SPECIAL MANAGEMENT AREAS
WE AGREE THAT CERTAIN AREAS ARE BY THEIR NATURE DESERVING OF DIFFERENT MANAGEMENT OF CARE OR USE. IT IS OUR ADVISE THAT THESE AREAS ONLY BE DESIGNATED AFTER DUE CONSIDERATION AND THAT THE NUMBER AND SIZE OF THESE AREAS BE AS SMALL AS POSSIBLE TO MINIMIZE DAMAGE TO AND/OR LOSS OF RESOURCES OR VALUES DUE TO MISAPPLICATION OF SPECIAL PRESCIPIONS OR RESTRICTIONS, SUCH AS CHAINING, BURNING, ROAD OBLITERATION AND REMOVAL OF HISTORICAL FEATURES IN THE NAME OF RECLAMATION.

-RESOURCE AVAILABILITY AND ACCESSIBILITY
AS THIS IS OUR PRIMARY CONCERN, IN THIS RESPONSE WE WILL ADDRESS THIS ISSUE UNDER THE APPROPRIATE SECTIONS AND HEADINGS.

-BUDGETS; AS THE BUDGET OF THE BLM IS GOING TO BE USED AS A CRITERIA FOR SELECTION OF MANAGEMENT PRIORITIES, THE REALLOCATION OF BUDGETARY MONIES TO IMPLEMENT AND ADMINISTER THIS RMP MUST BE SUBMITTED TO THE SAME CAREFUL CONSIDERATION AND PUBLIC INPUT AS ANY OTHER FACTOR GOING INTO THESE DECISIONS, AS MUST FUTURE BUDGET REQUESTS.

-CULTURAL AND PALEONTOLOGICAL RESOURCE MANAGEMENT
THOSE FEATURES AND ARTIFACTS OF THE PAST 150 YEARS ARE OFTEN GIVEN TOO LOW A PRIORITY, OFTEN RESULTING IN THEIR "RECLAMATION" AND SUBSEQUENT LOSS.
ALSO TOO LARGE A BUFFER ZONE AROUND AREAS OF INTEREST WILL ADVERSELY AFFECT OTHER RESOURCES AND USES, AND MAKE IT DIFFICULT TO MANAGE THE RESOURCE BEING PROTECTED.

-FIRE MANAGEMENT
COSTS OF FIRE SUPRESSION WILL INCREASE IN DIRECT PROPORTION TO REDUCTION OF ACCESS TO AN AREA. THIS MAY RESULT IN LARGER AREAS BEING BURNED. ALSO BEFORE/AFTER EFFECTS OF FIRES WILL BE GREATER DUE TO MOVEMENT OF FIREFIGHTING PERSONEL AND EQUIPMENT. THESE FACTORS AS WELL AS OTHER EFFECTS MUST BE

=VISUAL
ALTERNATIVE "A" ALLOW SEMI-PRIMITIVE ACCESS ROUTES ETC, TO ALLOW DESPERSION OF USE AND EXPLORATION BY CASUAL USERS ETC.

=WOODLANDS
=PRODUCTIVE PINYON-JUNIPER, USE SUSTAINED YEILD EXCEPT IN TREATMENT AREAS, MANAGE TO CREAT SUSTAINED FENCE POST YEILD CLEAR/ REPLANT IF NECCESSARY.

=CONIFERS, ASPEN, PINE, USE SUSTAINED YEILD,OR COORDINATE WITH OTHER MANAGEMENT PRIORITIES. PLANT AS PART OF RIPZONE TREATMENT, REPLANT AS NEEDED, SALVAGE DEADWOOD AS, CREATE SOME ECONOMIC VALUE IF POSSIBLE.

=700,000 ACRES USABLE FOR GATHERING, HARVESTING, CO-ORDINATE WITH OTHER MANAGEMENT GOALS IF POSSIBLE, TREATMENT AREAS SHOULD BE OPEN FOR PLANT SALVAGE.

== THANK YOU FOR THE OPPORTUNITY TO RESPOND TO THIS WELL-DONE DRAFT DOCUMENT.

Weston
Davidson
UT 4WD Assoc. Inc.

March 28 1992

Penelope Smalley, Team leader
BLM

Some comments pertaining to the Ruple Cabin alotment.

170-1 4.23 In reflecting the economic value to the community. You should include more than just the feed put into a.u.m. values. You should include everything involved, the value of the cow, investment in private lands. Because private and public lands are economically tied together. With out each other they are not an economical unit. Just the Uintah Basin Grazing Asso. alone puts more into the local economy than you have stated in the report.

May we suggest that you get help from professional economist, USU, or county agents who understand agricultural economics, to more fairly represent agriculture interests.

Also the visitor days seem over stated in value and numbers, for this report they should be tied only to BLM land users.

170-2 A2.6 On Ruple Cabin alotment the livestock aums have been voluntarily reduced to improve range conditions. But the increase in wildlife has more than filled in for those previously used by livestock. The proposed wildlife aums are to be more than double. We think this is extreme and puts to much pressure on the private land owners. While not doing enough on public lands to produce aums needed for public wild life.

The wild life going between Colorado and Utah needs monitered better. It isn't unusal for us to have 300 to 400 elk in just one day on the Ruple Cabin lands. While there should be only 390 wild life aums total.

170-3 We would also object to any new wild life species being introduced without permission of private land owners impacted.

Due to the volume of this draft, we may have missed something, we would like to be able to respond more in the future.

With Uintah Basin Grazing Asso.

Lynn Burton

RESPONSE TO COMMENT LETTER 170 (BURTON)

170-1 Please refer to our response 104-2.

170-2 We agree with your concern that sufficient forage be present to support objective levels of wildlife as requested by UDWR. We have planned approximately 300 acres of new sagebrush treatment within the allotment (refer to Appendix 8). We would also continue to maintain the more than 3,300 acres of previously treated sagebrush as per the agreement signed in 1988 between the UBGA, UDWR, SCS, and BLM. Vegetation monitoring would determine if objective levels could be met once all improvement work was completed.

170-3 Private landowners would be involved in any reintroduction of wildlife species to resolve issues prior to releasing wildlife.

Vernal, UT 84078
March 29, 1992

Jean Sinclear
Bureau of Land Management
Vernal District Office
170 S. 500 E.
Vernal, UT 84078

Dear Ms. Sinclear

171-1 I am opposed to any development of the Bear Hollow/Mame's Hole areas. These areas should not be destroyed by building new roads up and over Mame's Hole. This will bring pollution and trash to this beautiful area. These roads will also destroy the natural habitat of the wildlife which live in the mountain meadow environment.

Sincerely

Berkley Jesse Hall Jr.

RESPONSE TO COMMENT LETTER 171 (HALL)

171-1 Thank you for expressing your concerns. Please refer to our responses 12-1 and 53-1.

March 31, 1992

Jean Sinclear
DMRMP Team Leader
Bureau of Land Management, Vernal District
170 South 500 East
Vernal, UT 84078

Dear Jean:

I am writing to express my appreciation for the fine job you and your staff have done on the Draft Diamond Mountain Resource Management Plan, and particularly on Alternative E. I admit I've had time only to scratch the surface of the draft, but the parts I've read show that BLM is making the effort to provide for truly multiple uses—and fewer abuses. The volume as a whole must be equally good, for Will Durant doesn't pass out compliments lightly!

My special concern is for the slickrock/red rock area between Steinaker and Red Mountain. When I worked and lived in Dinosaur National Monument I labored under the naive belief that any scenery worth seeing was in the monument. After moving into Vernal and exploring its environs more, I saw how wrong I had been. Moonshine Arch and the steep Navajo Sandstone slopes around it are like a little piece of classic southern Utah canyon country transplanted right into our back yard. A little farther north and east, in the strike valley along the south slope of Red Mountain, there is an area of numerous pillars and small windows eroded in red sandstone. This latter area seems relatively unknown and undisturbed—I'm not sure what the land status is—and offers superb opportunities for hiking and solitude.

172-1 The Moonshine Arch area, in contrast, seems rather too well-known to a few ORV-users, vandals, and litterers, yet many other people who appreciate outstanding natural scenery have been unaware of it. It deserves much better, starting with physical barriers to vehicle access. Designation as a "primitive recreation site" of some sort, with encouragement of hiking and other non-motorized use, would be ideal protection. There may also be a potential for a mountain bike trail in the area, utilizing parts of the slickrock and the existing roads at the foot of the slickrock. Both hikers and bike riders would need to be educated to stay off fragile cryptogamic soils. Such protection, minimal trail development, and some interpretation could ultimately be linked with the Flaming Gorge-Uintas Scenic Byway Development Plan.

Thank you for taking the time to read my (and, I hope, many others') comments. Keep up the good work!

Sincerely,

Linda West

Linda West
764 West 500 South
Vernal, UT 84078

RESPONSE TO COMMENT LETTER 172 (WEST)

172-1 Please refer to our responses 70-1 and 79-2.

1671 North 3996 West
Vernal, Utah 84078
March 30, 1992

Jean Sinclear
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Jean,

As a member of the Grant L. Hacking Partnership who owns Mame's Hole and Bear Hollow, I am greatly concerned as to the proposed plans for these areas. I appreciate the care that the Bureau gives to the land but do not feel that the proposals for the above mentioned areas are necessary.

As I was listening to a news report on the American farmers and how they have always been the backbone of this nation and yet are quickly being driven out of business, I thought about what is happening now with our own land. My father has always taken great care to manage his private land in Mame's Hole and Bear Hollow for the benefit of the wildlife as well as his cattle. He has tried to preserve the natural state of the land and plant life also.

174-1 I oppose the creation of a road from Mame's Hole over into Lambson Draw because of the disturbance of the ecosystem and the possibility of fence cutting, trash, off road vehicle damage and danger to the cattle. I cannot see that the expense that this road would create would be worth the benefit of being built. It would take acreage from my dad who has paid many taxes which goes back into the community and take away feed for his cattle.

174-2 I am also opposed to the burn proposal without knowing specifically where the burn is to take place. My grandfather tried it many years ago and after a two year wait tried burning and the wind shifted and burned many acres that shouldn't have been.

174-3 The building of a campsite in Bear Hollow is absolutely unnecessary. How is the BLM going to patrol this area to keep the public from trespassing and desecrating the private land surrounding it. Has the expense of building this campsite been considered when there is a public campsite located at Matt Warner reservoir a few miles down the road.

I am opposed to all of these proposals because they are catering to the recreation side of our society and not the concerns of the tax paying farmers who are the food producers of this nation. Who is going to take care of this land and produce meat for people if little bits and chunks of it are continually opened up to the public. This affects not only the cattlemen but the fragile balance of the plantlife and the wildlife. We need to leave some of this area untouched by further development.

RESPONSE TO COMMENT LETTER 174 (HALL)

174-1 Thank you for expressing your concerns. Please refer to our response 12-1.

174-2 Please refer to our response 68-2.

174-3 Please refer to our response 53-1.

174-4 I am opposed to any development and increase in wildlife in the Mame's Hole and Bear Hollow area.

Sincerely,

Barbara H. Hall

Barbara H. Hall

174-4 Please refer to our response 53-3.

Conservation Issues Committee
134 West Main
Vernal, UT 84078

March 26, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

SUBJECT: Draft Environmental Impact Statement for the Diamond Mountain Resource Management Plan.

Dear Ms. Smalley:

After thorough study and discussion of your Draft EIS for the Diamond Mountain Resource Management Plan, we have made the decision to support Alternative E as the best alternative of the five presented for our consideration in the draft document.

It should be noted that although we support Alternative E a the best for the five alternatives, there are some modifications that we feel should be made in your proposed alternative before it is finalized.

It is important for BLM to realize that the economic future of the Vernal area will depend upon several, often conflicting, uses of the natural resources found on public lands. While much of our economic success, past and future, is linked to hydrocarbon and mineral extraction, there is a growing awareness that recreation and "quality of life" will pay an increasingly important part in the generation of revenues and livelihoods in Northeast Utah. The importance of natural resources that we may refer to as "amenities"--clean air and water, scenic vistas, the consumptive and nonconsumptive enjoyment of wildlife, the extraordinary cultural and paleontological resources, and a wide variety of recreational opportunities--cannot be overstated. It is the maintenance of these resources that enhances the quality of life for current Uintah Basin residents and that will also draw individuals and businesses to our area in the future.

A "full investment portfolio" for the future will include both protection of these "amenities" and preservation of environmental values, as well as the timely and beneficial use of renewable and non-renewable commodity resources on the public lands. In large measure, we depend upon the Bureau of Land Management for guidance and cooperation in planning a healthy economic future for the

Vernal area. The partnership that has existed between BLM and the Vernal Area Chamber of Commerce must continue, and we look forward to working with you in implementing a Diamond Mountain Resource Management plan that will be beneficial to all our Citizens.

What follows are specific observations and suggestions for improving the final form of Alternative E:

175-1 1. The Draft EIS seems to be comprehensive and Well-researched. Alternative E appears reasonable in the balance it attempts to strike between resource use and environmental protection.

175-2 2. A very positive aspect of the Draft EIS is its emphasis on riparian areas, rangeland improvements, and the protection and enhancement of scenic and recreational areas.

175-3 3. The Draft EIS places emphasis on the appropriate exchange and transfer of lands between BLM and private individuals where improvement of management would result and where all citizens would benefit. It also allows for the timely and appropriate transfer of lands to municipalities and to the county in cases where these lands would be essential for the continued growth and benefit of the community.

175-4 4. It allows necessary water development, new communications sites, and essential right-of-ways with adequate safeguards and restrictions.

175-5 5. "Protection zones" should be established around valuable and high-sensitivity archaeologic and paleontologic sites. While these zones may not prevent vandalism, they may help to avert damage by casual visitation. More interpretive facilities should be provided for the education of the public on these sites. Such facilities may actually encourage the public to help BLM protect sensitive sites in well-travelled areas. BLM must also give more emphasis to enforcement of those regulations for the public lands which protect unique and sensitive, "one-of-a-kind" sites.

175-6 6. There appears to be no difference between alternatives concerning the development of potential commercial phosphate deposits in the Red Mountain-Ashley Creek area. The high scenic quality of this area and the crucial wildlife habitat found there cause some ambivalence about the wisdom of allowing another full-scale phosphate mine in the foreseeable future. Most of the Chevron phosphate mine has not been adequately reclaimed, and until reclamation has proceeded further it may not be wise to allow the magnitude of surface disturbance you foresee with full scale development of the resource.

175-7 7. Considering the expanse of public lands now open to OHV use, it may be good management to restrict OHV use in riparian areas, areas of highly erodible soils, critical soils and floodplains, cultural and archaeological protection zones, and areas with semi-primitive, non-motorized values. This would provide adequate

RESPONSE TO COMMENT LETTER 175 (VERNAL CHAMBER OF COMMERCE, CONSERVATION ISSUES COMMITTEE, Perry)

175-1 Thank you for your comment.

175-2 Again, thanks.

175-3 Thank you for your support.

175-4 Thank you.

175-5 BLM will continue to emphasize protection and interpretation of both paleontological and archeological resources as well as enforce existing laws dealing with disturbance and removal of these important resources.

175-6 Please refer to our response 113-1.

175-7 The limitations you recommend are being included in the proposed plan. We recognize the importance of the Moonshine Arch area and the need to develop a management plan that will protect the area.

175-7 Cont.

protection to sensitive areas, and more diversity in the recreation spectrum on BLM lands. Specifically, the extraordinary area known as Moonshine Arch, located north of Steinaker, has undergone marked degradation and scenic damage is occurring or has occurred to the slickrock.

Thank you for the opportunity to comment on this Draft EIS. We appreciate the hard work that has gone into bringing this document to the public in its current form, and we look forward to sharing with you in the wise management of our public lands in years to come.

Best regards,

P.S. Please understand these comments are made by the Conservation Issues Committee of the Chamber and do not necessarily represent the opinion of the Chamber Board of Directors or the Chamber membership as a whole. The Board of Directors has asked each committee to prepare its own ideas and suggestions where it feels it appropriate.

March 30, 1992

Penelope Smalley
Bureau of Land Mangement
Vernal District
170 South East
Vernal, Utah 84078

Attention: Penelope Smalley

We have reviewed the Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement and tried to understand it. We are concerned about the 'take from livestock - give to wildlife' impression we get.

We believe the BLM has a good track record in managing or monitoring our allotment (Little Hole). According to our figures and yours, we run 1 cow to 96.5 acres from June to October. This is a high acre per cow ratio.

176-1 For 11 years we have used Taylor Flat allotment to help manage the Little Hole and delay the use of the grass for 30 days. On page A8.40, the Little Hole is listed in unsatisfactory condition. We disagree.

We have built several reservoirs to improve cattle distribution and recently proposed a pipeline. We realize water holes and wet meadows can be overgrazed, but by using Taylor Flat, we have observed, as we gather and move cattle, an overall improvement in the Little Hole.

176-2 The chart on A2.6 shows you want to double the wildlife AUM in the Little Hole and the same chart says the current resident deer population is 44. We believe this is a low figure, but believe wildlife and livestock AUM could be significantly increased with juniper and pinion control. (through controlled burning)

176-3 Page 4.60 shows that 9,000AUM will result in $11,500 yearly loss to the local livestock industry. This is incorrect.

176-4 Referring to page 4.59, we would like to comment that firewood is and important resource. Dead and down trees and dead-standing trees should be harvested.

176-5 On page 4.56, we believe the black-footed ferret transplants put too many restrictions on the multiple use system.

176-6 On page 4.16, Gov. Norman Bangerter is used as a reference and we don't feel he has an expertise in this area and his comments should not be taken as fact.

176-7 On page A7.12, Gorge Creek is listed as being 17 miles long. This is incorrect. It is closer to four miles and two of those miles are on private ground. We know of only 3 places livestock can drink out of Gorge Creek. They can not trail up it or down it. We feel that Gorge Creek should definitely not be a riparian or wild and scenic river system concern.

176-8 On page A7.14, Little Davonport Creek is listed as the headwaters being in confluence with Gorge Creek. This is incorrect.

176-9 We are opposed to the closing of riparian areas to livestock grazing. These areas can be managed! (see page 2.54)

176-10 On page A8.40, the Little Hole is listed as a riparian concern. WHy? We would like this clarified.

176-11 Referring to page 2.30, we are concerned about the Wild and Scenic River Act. There are too many restrictions that affect the use of natural resources. It infringes on private property rights.

RESPONSE TO COMMENT LETTER 176 (HUNTING)

176-1 The Little Hole Allotment was listed in unsatisfactory condition in error; it has been changed to show satisfactory condition.

176-2 One thousand (1,000) acres of closed stands of pinyon-juniper are proposed to be burned and seeded in the Little Hole Allotment. Please refer to Table A8-4. The 44 deer is an estimate of deer numbers on public lands only. This may account for the differences we estimate and the number you have observed.

176-3 Please refer to our response 104-2.

176-4 It is our opinion that cutting cottonwoods adjacent to the Green River (including dead and down) would not be compatible with protecting riparian or wild and scenic river values. Such trees also provide valuable perching and possible nest sites for numerous bird and small animal species. There are many areas in the resource area where dead and d own pinyon and juniper firewood can be harvested.

176-5 All black-footed ferret reintroductions would be classified as "experimental nonessential" which allows for management flexibility to assure the reintroduction would not significantly impact existing or future land uses on public lands. All proposed restrictions have originated from draft USF&WS guidelines intended to ensure a successful reintroduction. We have also recommended no changes to current authorized permits or leases in areas where black-footed ferrets are proposed for reintroduction. We believe this does not restrict multiple use.

176-6 The reference to Governor Bangerter has been corrected to USF&WS, 1985. Please refer to the reference section of the document for the complete citation.

176-7 Gorge Creek was listed as 17 miles in length in error, the correction has been made to read 1.7 miles. Although Gorge Creek is inaccessible for the most part, it is considered a riparian area because it exhibits riparian vegetation. Gorge Creek was inventoried and placed in a late seral stage of ecological condition; however, the lower end next to the Green River is below its potential. Gorge Creek was determined to be non-eligible for further consideration in the national wild and scenic river system. (Please refer to Appendix 7.)

176-8 Thank you for the correction, the change has been made to the text.

176-9 Please refer to our response 92-9.

176-12 We are opposed to the acquisition of private land by federal or state agencies. (page 2.11)

176-13 We are opposed to the closing of bear baiting. (page 2.35)

176-14 After reviewing this document we feel that none of these alternatives are acceptable without serious revision. As private land owners and permittees, who are concerned, who use, know and improve the natural resources, we feel we, and others like us should have more imput on the direction of this management plan.

There are many other comments we would like to make but they are not specific to our main concern.

Sincerely,

Ray Hunting

Marilyn Hunting

Rayma McCarel

Scott McCarel

176-10 Little Hole Allotment is listed as a riparian concern due to the increasing presence of noxious weeds, primarily whitetop, along the banks of the Green River. Riparian conditions are far below potential where livestock can easily access the river and livestock can be a conflict with float boaters.

176-11 Please refer to our response 30-1. Managing a river corridor to protect wild and scenic values could, at times, limit some types of uses in the river corridor. Private property rights would not be affected.

176-12 Thank you for expressing your concerns. Any transfers of land ownership involving private land would be on a willing seller or willing giver basis.

176-13 Please refer to our comment 114-34.

176-14 Thank you for your comment.

Brent Hansen, CPA
P O Box 263
Vernal, Utah 84078

March 31, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

RE: Diamond Mountain Resource Management Plan

Dear Ms. Smalley:

I support alternative E. But, some improvements need to be done to that alternative before it is acceptable. Alternatives C and D are inconsistent with balanced management as required by the Federal Land Policy and Management Act because of their emphasis on livestock and minerals over other resources. Alternate A is the status quo which is unacceptable because management practices and values have changed since the previous plan was adopted.

I support the Uintah Mountain Club's proposed changes for alternative E. Their suggestions provide better protection of the resources and a better definition of multiple use. You can not use all lands for all uses. Some uses preclude other uses so there has to be an understanding that some lands will be limited to certain uses. Multiple use means that the needs of all users will be met.

177-1 How can you claim that you have a balanced alternative when you will allow livestock grazing on 99% of the land and leasable mineral activities on 90% of land and open the other 10% with no surface rights (page 2.30)? Only 1% is closed to grazing and zero is closed to mining. Multiple use and a balanced plan require that these percentages be decreased.

You have not included enough land under the level 1 and 2 classifications. There is definitely more than 1% of level 1 land in this management area. And, because of all the critical wildlife winter range and archaeological sites within this area, the level 2 acreage is understated. You need to provide more protection to a larger percentage of the land in this plan.

177-2 Phosphate mining should not be permitted in the Red Mountain-Ashley Creek area. This land has high scenic value and is critical/crucial winter range for deer and elk. You did not provide

RESPONSE TO COMMENT LETTER 177 (HANSEN)

177-1 Please refer to our response 61-1. The multiple use concept does not require multiple use on every acre nor does a balanced plan require a more even split of the management levels. We attempted to use the priority management area concept and assigned resource values to the specific management levels consistent with the overall management objectives for the proposed plan and each alternative.

177-2 Please refer to our response 61-2.

177-2 Cont. a broad range of management direction on this issue because all of your options allow phosphate mining.

177-3 More protection of the slickrock area north of Steinaker Reservoir is needed. This scenic area needs to be protected. It should be closed to OHV use. You should actively work to acquire section 16 in the Red Mountain Area for improved management of this area.

177-4 Protection zones need to be established around important and sensitive archaeological and paleontological sites which limit or restrict surface disturbing activities. More survey and enforcement activities are needed to protect these resources on public lands.

177-5 The lands in Diamond Breaks and West Cold Springs WSA's need to be placed in the Browns Park Complex ACEC should either of these not receive Wilderness designation.

177-6 I support Wild and Scenic Status for the Upper and Lower Green Rivers. I have on both stretches and they both qualify for this special designation.

177-7 Too much of the area in alternative E is open to OHV use. 84% with no or seasonal restrictions does not equal a balanced plan. Especially when only 6% is closed to OHV use (excluding any roads within that 6%). As a minimun alternative B should be implemented on this portion of the plan.

177-8 The riparian protection zones are too narrow at 330 feet. They should be twice this width. The experiment on Salt Creek in Wyoming where a stream was created where there was no stream showed that the surrounding vegetation will create raparian habitat if it is properly managed. Livestock grazing in these extended zones prevent the vegetation from expanding the water zone.

177-9 I do not agree with the plan to aggressively suppress all wildfires (page 2.31). Fire is an important and natural tool for nature. Suppression of all fires is poor management. This kind of policy is what got us in trouble at Yellowstone. I believe that wildfires should be permited to burn unless they threaten structures or are life threatening.

177-10 An allowable cut of 3700 cords of wood per year (page 2.31) is contrary to the assumption that a maximum of only 3000 cords of greenwood should be cut (page 4.15). Opening up 85% of the woodlands for cutting only leaves 15% of the land as natural woodland. This is inadequate since part of this 15% will be poor woodland.

177-11 You need to further restrict cedar post and christmas tree cutting to be the "lesser of demand or substainable yield". You sold 560 tree permits for an area where good quality trees are rare (page 3.72). Why sell something you do not have?

177-3 Please refer to our responses 70-1 and 79-2.

177-4 The need for protection zones around important archeological and paleontological sites was discussed during preparation of the plan, but it was determined they would not be needed because the laws that protect these resources give adequate protection without establishing additional protection zones. We agree that more surveys and enforcement activity is needed to protect these resources.

177-5 Please refer to our response 77-5.

177-6 Thank you for your support.

177-7 The purpose of OHV restrictions is to protect resources that would otherwise be damaged if the situation went uncontrolled. We feel that objective will be accomplished in the proposed plan. Approximately 42 percent of the resource area would be open, 6 percent closed, and 52 percent would be limited either yearlong or seasonally to designated roads and trails.

177-8 The 330-foot riparian zone begins at the outer edge of the riparian vegetation. BLM believes this provides adequate protection to riparian areas. Please refer to Appendix 6 for the BLM Utah's riparian policy.

177-9 We do not propose to aggressively suppress all wildfires. Refer to Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, for common guidance for prescribed fires. Naturally or human-induced fires would be allowed to burn when approved prescriptions are established and burn plan prescriptions are met.

177-10 The maximum firewood cut that can be maintained on a sustained yield basis in the proposed plan, is 3,700 cords per year. This figure was derived after eliminating all productive acres that could not be harvested due to restrictions imposed on woodlands by other resources or topographic features. It was assumed, based on demand, that the annual cut would level off near 3,000 cords per year. The additional 700 cords would be available for harvest each year if demand increased due to some unexpected event. Assuming 3,000 cords are cut each year, 65 percent of the productive woodland area would never be cut.

177-11 We realize good quality christmas trees and cedar posts are hard to find in the resource area. The only permits we sell are for personal use. There are many families that use this recreational opportunity for an early winter outing and

Diamond Mtn Resource Mgt Plan -- March 31, 1992 -- page 3

177-12 You only have 78000 acres of commercial value timber capable of a substable yield. The other 105000 acres are not productive enough to manage for a substainable yield (page 3.70). Harvesting this other acreage could prevent its return to a woodland site. On page 1.14 you state "All alternatives contain measures for protection of important woodland resources." This statement is false as indicated in the above paragraphs.

177-13 Why does alternative E specify treating 19,400 federal acres, when assumptions on page 4.15 says "Total vegetation treatment opportunities could be realized on approximately 18,000 acres . . . over the life of this plan"? Is this a balanced plan, or are you looking out for the livestock industry at the expense of other concerned users?

I have writen several other comments in my book which would be time consuming and lengthly to put into letter format. Therefore, I have attached copies of the relavant pages. If you can not read may sloppy writing, I can come in and read it to you. My phone number is 789-7162.

Sincerely,

Brent Hansen

Brent Hansen, CPA

attachments

have been doing it for years. The opportunity to cut a family christmas trees is very important to many people, even though the quality of the tree they cut may be only fair.

177-12 We have approximately 78,000 acres of pinyon-juniper woodlands productive enough to be managed on a sustained yield basis for firewood production. There are many other pinyon-juniper areas in the resource area that could be cut for firewood, but do not grow fast enough or reproduce well enough to be considered productive stands. Many times the best use of these areas is for wildlife habitat or livestock forage and they may, in some areas, be harvested with these goals in mind.

177-13 The 22,950 acres shown in Table 2-15 and A8-4 is a total figure, which includes vegetation treatment for wildlife and watershed management principally in the sagebrush and pinyon-juniper woodland communities.

NOTE: Mr. Hansen included hand-marked pages from the draft document. For the sake of brevity only, these additional pages are not included in this document. They may be reviewed at the Vernal District Office.

Lamont W. Moon
P.O. Box 257
Duchesne, Utah
84021
Phone: 738-5742

U.S. Dept. of The Interior
Bureau of Land Management
Diamond Mountain Resource Area
Resource Management Plan and
Environmental Impact Statement

Dear Sirs.

The first paragraph on page 1.5 reads as follows: "This issue involves the conflicting demands for consumptive and nonconsumptive uses of the vegetation, soil, and watershed resources within the Diamond Mountain Resource Area. The basic challenge is protecting resources such as rangeland values, air, water quality, soils productivity, vegetation cover, riparian areas and wildlife habitat while allowing, to the extent possible, uses affecting these resources. Conflicting uses could include: livestock
178-1 grazing, woodland product harvest, off-highway vehicle use, recreation development, oil and gas development, and mining activities. The following questions will be answered in the plan."

I think this paragraph is a good example of the bias, and could be irresponsible thinking that we are seeing so prevalent in our country today. Part way through the 1st paragraph the word, conflicting, is used in referring to livestock, woodharvest, oil & gas, and mining. The real conflict is: how are the schools, hospitals etc. going to improve as they ought to while such a concerted effort is being taken to destroy the tax base. We are allowing things that are thrilling and exciting, to take precedents over things that are important.

Page 1.9 The Fish and Wildlife Habitat Management write up has the same problem as mentioned above.

Page 2.6 Animal Damage Control - The A.D.C. should have authority to control predators. The B.L.M. should
178-2 stick with range management, which should include the control of overstocking of big game, as is done with domestic stock.

Page 2.9 Livestock Management - Mention of the Taylor
178-3 Grazing Act of 1934 PRIA of 1978 as inadequate, is based on the fact that more wildlife and pleasure in America is what

RESPONSE TO COMMENT LETTER 178 (MOON)

178-1 Economic impacts are analyzed for each alternative in Chapter 4. Impacts from implementing the proposed plan should not significantly reduce the local tax base.

178-2 BLM responsibilities in animal damage control (ADC) are outlined in Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives.

178-3 Under management common to the proposed plan and all alternatives for livestock in Chapter 2, it was not stated that the Taylor Grazing Act and PRIA were inadequate. It does say however, that the existing planning documents did not clearly analyze the forage needs for objective wildlife levels.

178-3 Cont. is needed. Japan and much of the world is laughing at us. The people who wrote the Taylor Grazing Act etc. were people that had been affected by wars and hard times. They recognized what was important in relation to pleasure. How far are we going to continue in the direction that is drawing ridicule from Japan. Lets use our man-power and money in producing things that will compete on the world market.

178-4 Table 2:13 Alternative C is the best.
See the following under:

178-5 Page 2.35 Habitat Improvement - Increase wildlife only as improvements are made, is good.
Page 2.35 Habitat Protection - Most suggestions under this would be too expensive to manage in contrast to damage alone. We need limited control.
Page 2.40 Wildlife Transplants - Elk and Antelope are even now becoming too many. The B.L.M. needs to do more control, not use Fish and Game Counts. We don't need Big Horn Sheep if it will harm the livestock industry, destroy tax base or customs & culture.
Page 2.45 Livestock - I feel the B.L.M. should maintain present livestock numbers.

178-6 Page 2.47 Guzzlers and Springs are preferred to too many ponds. Most all reservoirs beome boggy as they silt in and thus become a great danger to livestock.
Page 2.51 Recreation Development - Maintain existing facilities.

Vegetation

178-7 Page 2.57 Control noxious weeds!

178-8 Page 2.59 If forage assignment can not be met, wildlife should be reduced.

178-9 Page 3.4 Antelope should stay at present level - not keep increasing. Elk numbers in many areas are too great.

178-10 Page 4.60 Dollar figures are not correctly portrayed. Can dollar values for recreation and dollar values for livestock industry really be compared. One will feed the world in good as well as hard times, while the other will only happen in good times. Pleasures happen in a time of ease. In hard times people do without luxuries and pleasures. Are the comparison of dollars for wildlife and domestic stock like trying to mix oil and water?

178-11 Page A2.3 Big Horn Sheep will cause a serious problem to the livestock industry. What becomes of customs and culture!

178-12 Table A2.7 See Castle Peak: The current number of Antelope and Elk stated in the chart are no where close to the present numbers. The objective of 255 Elk and 217 Antelope is too big. I highly appose such numbers.

178-4 Thank you for your comment.

178-5 Please refer to our response 68-1 which discussed livestock-wildlife forage needs. Our analysis shows range improvement work could also supply additional forage for livestock and wildlife on the Castle Peak allotment. We believe the reintroduction of native bighorn sheep would not significantly affect the livestock industry as outlined in the proposed plan. Changes from domestic sheep to cattle would be accomplished through voluntary negotiations. Please refer to Table 2-15 under livestock.

178-6 Guzzlers are generally more expensive to construct than reservoirs and spring locations are limited. In many cases reservoirs are the only feasible water source option.

178-7 Thank you for your support.

178-8 Please refer to Table 2-15 under vegetation for forage assignments.

178-9 Please refer to our response 68-1.

178-10 Please refer to our response 109-4.

178-11 Please refer to our response 178-5 above. Any AUM losses to livestock due to negotiation to eliminate domestic sheep from proposed bighorn sheep reintroduction areas under the proposed plan would be accomplished over time and done voluntarily by grazing operators through change in class of livestock and alternative grazing systems. We hope this would alleviate any serious problems to the livestock industry.

178-12 Appendix 2 displays current wildlife use in AUMs, not individual animal numbers. If we assume the big game use in the Castle Peak allotment for 6 months, the AUMs would convert to 75 deer, 66 antelope, and 17 elk current use; and, 125 deer, 348 antelope, and 80 elk objective use. These estimates are for public land only and do not account for big game use on adjoining state and/or private lands. Based on herd unit population figures supplied by UDWR, we attempted to "pro-rate" these estimates on an individual allotment basis. We realize such an exercise could account for the difference in numbers we estimate for Castle Peak allotment and the numbers you have observed. Achieving objective levels would be based on continued range improvement work and vegetation monitoring to assure adequate forage is available to all.

#19 Starting last season the Castle Peak Allotment started to be used by both sheep and cattle.

Table A8.4 See Castle Peak - Alternative (A&C Co.)

178-13 I suggest a firewood harvest of 300 acres, which is good; however, 100 ponds are suggested which would be a great detrement to the country. It would create too many dog holes. All ready this is the best permit on the B.L.M. South Myton unit for well distributed water.

Approximately 18 good ponds now exist:

1) 2 at Crow Knolls
2) 1 at Snider Spring
3) 2 further down Snider Spring Wash
4) 3 at billies Knolls
5) 3 in Castle Peak wash northeast side of permit
6) 4 at view Knolls
7) 3 at Castle Peak
8) 1 northeast of gilsonite mines
9) 1 between Snider Spring and Crow Knolls

Livestock producers are discontented. Oil companies in the Uintah Basin are selling where possible and moving, in some cases, over seas. The list goes on. How much further can we allow environmentalists to create rules and regulations which are pushing industry in the back ground?

Sincerely,

Lamont W. Moon

Lamont W. Moon

178-13 The correction of adding 18 existing reservoirs to Table A8-4 on page A8.3 has been made. Also the 100 reservoirs have been changed to read 50 on Table A8-4. These reservoirs would be built primarily for watershed improvement, but would have other benefits such as providing wildlife and livestock water and providing potential sites for riparian establishment.

Daggett Soil Conservation District

MANILA, UTAH 84046

March 30, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley:

The Daggett County Soil Conservation District Board is responding to the request for review of the "Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement."

179-1 As a District Board we feel that the document is biased towards Tourism and Wildlife. We are supporting the letter that has been prepared by the Permittees. We feel these permittees support the concept of multiple land use.

We are attaching to this letter the comments presented by the permittees. Please address each of the items as you prepare the final document for the Diamond Mountain Resource Area.

Thank you for your consideration.

Sincerely,

Ivan G. Ruble

Ivan Gene Ruble
Chairman

RESPONSE TO COMMENT LETTER 179 (DAGGETT SOIL CONSERVATION DISTRICT, Ruble)

179-1 Thank you for your comments.

GENERAL COMMENTS:

Economics of the Livestock Industry in Uintah County:

Several times in the document agriculture is referred to as a minor or insignificant industry. According to the 1991 Utah Agricultural Statistics agriculture produced the following cash receipts:

	Dagget County	Duchesne County	Uintah County
1989 Cash Receipts			
Livestock & Livestock Products	$1,500,000	25,700,000	19,900,000
Crops	$200,000	4,200,000	3,400,000
Total	$1,700,000	29,000,000	23,300,000

Total for 3 Counties = 54,000,000

179-2 Fifty-four Million seems like a significant amount of money to us, the Diamond Mountain Resource Area has a direct impact on agriculture in these counties. As you can see most of the money derived from agriculture in the basin is due to livestock. Most of which at some time or other spend time on public land.

Several times in the document the value of an AUM is assumed to be $9.19. This value we believe, refers to the value of the forage to the permittee, including all cost associated with raising livestock except the capital cost of the livestock itself. This is not the value an AUM returns to the economy. In a paper publish in the Utah State Economics Department Dr. Nielsen has research the value for AUM to local Utah communities generated by cattle and sheep. The values per AUM of federal grazing for range animals in Utah's economy are:

Gross value cattle (cow-calf operation)	= $23.72/AUM
Net value cattle (cow-calf operation)	= 13.66/AUM
Net value cattle x 3.5 multiplier	= $31.43/AUM
Net value sheep x 3.5 multiplier	= 47.81/AUM
Gross value sheep & cattle (slaughter weights)	= $35.86/AUM
Gross value sheep & cattle (retail-cut value)	= 54.07/AUM

The 3.5 multiplier is from a state economic sector study by Dr. Syder USU Economist. He estimated the appropriate multiplier to measure secondary impacts to be 3.5 and should be used on net values.

179-2 Please refer to our responses 3-24, 104-2 and 104-3.

To figure a weighted average we took the net value for cattle and sheep and times that by the number of allotments which are: 88 cattle allotments and 16 sheep allotments. We took an average of the 31.43 value for cattle and the 47.81 value for sheep for an average value (39.62) for the dual-use allotments and obtained the following values:

179-2 Cont.

88 x $31.43	=	2,765.84
16 x $47.81	=	764.96
4 x $39.62	=	158.48
		3,689.28

88 + 16 + 4 = 108

3689.28/108 = 34.16

The $34.16 would represent an average AUM value on the Diamond Mountain Resource Area which is significantly higher than the $9.19 value use to calculate gains or losses to the industry in the document.

We also believe it should be realized that several economists are questioning the value of hunting and tourism to local economies. They make the point that after you take in the amount spent on building and maintaining roads, providing additional law enforcement, picking up litter etc. in some cases tourism and hunting might have a negative economic value or a value that is significantly below the $25.00 value that is used in the document.

Also even though tourism might help the local economy, it must be realized that it does not generate any new wealth. If the money is spent here that means it is not spent in some other community. In contrast, the livestock industry generates new wealth every year with that year's production of livestock.

Furthermore, reductions in livestock AUMs result in direct loss to the local economy, a 9000 AUM reduction means that quantity of animals and the associated dollars are lost to the local economy. While an increase in the number of Wildlife AUMs might draw more tourist or might not draw more tourist and hunters depending on a number of factors and conditions.

Of deep concern to the livestock operators is the fact that every citation in the document concerning livestock returns refers to gain or loss to the livestock permittee or livestock industry. Never is it mentioned as a gain or loss to the local economy. In contrast, in almost every case gains or loss to the tourism industry is expressed as a gain or loss to the local economy. It is not expressed as a gain or loss to the local tourism industry. As livestock operators we feel we are an integral part of the local economy as we live here spend our money here and have done so for generations.

Wildlife/Livestock Conflicts:

179-3 Several times in the document conflicts are mentioned between wildlife and livestock. In almost every incidence the recommendation is to reduce livestock AUMs. While this might be the only solution in some causes we believe in most incidence's wildlife and livestock can coexist on the range. Terry Messmer Utah State Wildlife Extension Specialist recently reviewed the available literature on the subject he found 150 studies that looked at the effects of wildlife and livestock grazing. In 150 studies that mention livestock and wildlife 88% reported beneficial effects to wildlife from livestock grazing. We believe with proper management livestock and wildlife can graze together with beneficial effects to both. We also believe that this is also the best management practice to keep the range healthy and productive. Furthermore, since the area is supposed to be managed as a multiple use area we believe this best fits that usage. Included with this letter is citations of 52 studies reporting beneficial impacts from livestock to wildlife.

Bighorn Sheep Introduction:

179-4 The management plan calls for introduction of Rocky Mountain Bighorn Sheep. It also calls for a 10-mile buffer zone around reintroduction sites from domestic sheep. However the 10-mile buffer zone was not documented to any literature. We did find the Desert Bighorn Council did in one of there transcripts recommend a 9-mile buffer, however this was not based on research it was just a recommendation. It seems that the size of the buffer zone should be based on topography and be highly dependent on the natural barriers that separate the species. In Nevada Bighorns have been successfully reintroduced with a 2-mile barrier. Although, the several times bighorn reintroduction is mention in the document only one time does the document describe all the factors that govern successful reintroduction, these include: Adequate quantities of available range (2) lack of competition with other ungulates (3) Improper juxtaposition of key habitat components (5) adequate quantities of one or more critical seasonal ranges (6) lack of human harassment (Smith et al. 1991). We believe because of the serious impact these releases would have on livestock permittee's in these areas, very serious study and consideration should be given to these releases. We also feel much more research is needed on the subject, as these releases are extremely expensive and can force local sheep operators out of business. If bighorns are to be reintroduced it should be with the smallest buffer zone needed so as not to waste resources and lower the impact to local sheep producers. Therefore, we would like to see justification for the 10-mile buffer zone in the Diamond Mountain Resource area and how that was arrived at. Recently University of Idaho Veterinary Scientist have done several studies to study disease transmission from domestic livestock to Big Horn Sheep. In consulting with Dr. Alton Ward Head Diagnostic Bacteriology, several questions have

179-3 Please refer to our response 52-2.

179-4 Please refer to our responses 116-8, 178-5 and 179-22.

179-4 Cont.

sheep populations. In sampling 250 live-captured, and 7 dead bighorn sheep from Central and Southwestern Idaho and 19 Dall Sheep captured near Arctic Village Alaska. Lungworms were present in all groups even though none of the animals had contact with domestic animals. Also lungworms were found in two lambs that were taken by caesarean section and separated from the ewe suggesting the worms can be passed to offspring in the maternal environment. Furthermore, DNA fingerprinting of lungworms obtained from domestic and wild sheep showed they were a different species. Dr. Foryet found that in vaccinating wild sheep with domestic sheep Lungworm vaccine that the wild sheep still died. It appears that earlier literature suggesting lungworm transmission from domestic sheep to wild sheep was invalid because samples were taken from the nasal passages only, while recent research has shown that most wild sheep harbor the organism in greatest numbers in the tonsils. In talking with Dr. Ward he felt there were a combination of factors that caused Bighorn mortality including: Viruses, bacteria, stress, and population that are so small inbreeding results and causes a reduction in the immune system. Also, while Dr. Ward thought the populations should be separated, he could see no justification for a 10-mile barrier. Included is some recent research on the subject.

Section: Summary

	Page:	Comment:
179-5	i	The management priority area concept is not defined as to how or what criteria are used to designate the levels also what personnel is envolved in making this decisions. Also these management priority areas should be guided by the multiple use concept and not give one use priority above another use.
179-6	iv?	Comment by Aldo Leopold according to the World Book Encyclopedia he wrote several essays defining the need to have wilderness areas. We hope this does not set the tone for the entire document as devoted to one area of interest and not to a multiple use, multi-group area.

Section: Chapter 1 Purpose and Need

	Page:	Comment:
179-7	1.5	Under the title Resource Uses Affecting Vegetation, Soils and Watershed Values, this whole section is aimed primary at developing wildlife habitat. It fails to address range improvements that will benefit wildlife and livestock. Also the paragraph on areas suitable for livestock grazing, grazing is not restricted to livestock, wildlife also graze, no mention is made of controlling over grazing by wildlife.
179-8	1.9	Under the title Fish and Wildlife Habitat Management at the top of column two the statement land closures for livestock grazing or surface disturbance are identified in terms of wildlife objectives. This seems to imply that wildlife are the dominant consideration, and that land closures for livestock grazing or surface disturbance is the only way to reach these objectives. This does not consider the most important factor, habitat, which may actually be improved by livestock grazing and it assumes that the grazing of livestock and wildlife have to be detrimental to each other.
179-9	1.14	Under the title Vegetation Management the statement Conflicts between wildlife and

1

179-5 Please refer to our response 61-1.

179-6 Thank you for your comment.

179-7 We believe the first paragraph in the section you reference adequately explains the issue of resolving conflicting demands for consumptive and nonconsumptive uses of vegetation, soils, and watershed resources. The subsequent questions related to these broad issues are meant to help identify and analyze all uses affecting these primary resources and management actions necessary to maintain or improve these resources for the long term. The term 'management practices" ,as used in these questions, include range improvement and vegetative treatment, both of which may be beneficial to both livestock and wildlife.

179-8 The statement: "Land closures for livestock grazing or surface disturbance are identified in terms of wildlife objectives", has been deleted.

179-9 The statement: "At least one alternative gives wildlife first priority on critical winter ranges", has been deleted.

179-9 Cont. livestock forage uses are identified in terms of range carrying capacity. At least one alterative gives wildlife first priority on critical winter ranges. This statement fails to recognize vegetation management is the main objective and any management objective should be thought of in terms of the best possible management strategy for that goal and not in terms of giving wildlife or any other use first priority.

Section: Chapter 2 Alternatives

Page:	Comment:
179-10 2.7	The statement Livestock grazing management will incorporate the needs of key plant species important to wildlife and safe to use by wildlife . . . we hope this is also takes into account the fact that livestock grazing can benefit plant species needed by wildlife and can have a positive effect on vegetation management.

Section: Chapter 3 Affected Environment

Page:	Comment:
179-11 3.11	Under the heading Mule Deer in the statement about deer wintering in the Brown's Park area no mention is made of the resource damage that is occurring do to high deer populations (Urness PC). [illegible]
179-12 3.50	The statement "Riparian communities along the Green River have been affected by historical human and livestock overuse and regulation of river flows from the Flaming George Dam." This statement does not include the damage from wildlife in that area.
179-13 3.50	Under Socioeconomic heading the statement "since the twentieth century, however a slow progression toward a land-extractive economy has been occurring" it must be realized that agriculture has not diminished in the area also agriculture is probably the most stable industry in the area.
179-14 3.52	Under the heading Recreation the statement "the

179-10 Livestock grazing benefits to plant species needed by wildlife has been taken into account. Deer winter range in Browns Park, for example, is maintained by allowing spring cattle use on grass in the area to promote the vigor of existing sagebrush species.

179-11 The following sentences have been added to Chapter 3, under mule deer to clarify the heavy deer use. Six years of drought conditions (1986-92) have reduced sagebrush forage production and plant vigor on much of the deer winter range. Heavy deer winter use has intensified this problem and has been documented on the annual interagency deer pellet group transects. In response, UDWR has issued over 2,850 doe permits to offset these poor forage conditions.

179-12 We were unable to document historical wildlife overuse in the riparian communities along the Green River and thus the reason for wildlife being deleted from this sentence.

179-13 Thank you for your comment.

179-14 The economic section in the document has been substantially modified. The $25 figure you refer to has been removed.

179-14 Cont.

net economic value per day for recreation visitor day is $25." We would assume the means on average and he is not saying $25 is without exception the value. Also there is no mention of how this value was derived this needs to be explained and documented with facts or data.

179-15

3.53

Table 3-23 this table has some impressive figures on it however, it has no documentation as to how the net economic value was derived therefore no way to tell if it is accurate or not. Also is this net economic value to the Uintah basin or to Utah, Wyoming and Colorado.

179-16

3.53

The first paragraph that addresses hunting and recreation the reference to the citation by Bangerter 1989. This citation has no place in a scientific document a political speech by a political figure with no training in economics is very dubious to its validity. These figures may or may not be accurate, however where they were obtained is unknown so they cannot be validated. If these figures are to be cited they should be referenced to the person who calculated them and how they were calculated, not to who used them in a speech.

179-17

3.53

Under the heading Agriculture, the statement agriculture plays a minor role in the basin economy is hard to define what is considered a minor role, and even if it is minor it is an important role to those affected by it. Also the statement Presently an AUM is valued at 9.19 as determined by the Agriculture Statistics Service USDA (1991). This might be a true statement but should not be used in the context that an AUM is only worth 9.19 to the local economy. The figure 9.19 is the value on average that AUM is worth to the permittee. The value of a Cow Calf AUM in Utah is estimated at 34.16 (Nelson 1991). This is the figure that should be used for economic comparisons, especially when comparing effects with hunting and recreation dollars.

We could not find this figure.

Section: Chapter 4 Environmental Consequences

Page:	Comment:
179-18 4.4	Under the heading Livestock the statement "the more recent demand for leaner red meat may

179-15 Table 3-23 of the draft has been deleted. We believe the information as provided in this document adequately presents and analyzes the social and economic conditions and impacts of the proposed plan and the alternatives.

179-16 The correct reference for Governor Bangerter's speech is the 1985 "National Survey of Fishing, Hunting, and Wildlife Association Recreation -Utah", prepared by the U.S. Fish and Wildlife Service. The reference section of the document has been revised.

179-17 Please refer to our response 104-2.

179-18 The assumption section of Chapter 4 provides a basis for analysis based on available literature and trend. A demand for leaner red meat is not necessarily contrary to the statement that the livestock industry appears to have reached maturity in the West, it may mean a shift from feedlot finished cattle to rangeland cattle.

179-18 Cont.

affect the use of feedlots, increasing demand for rangeland forage by yearling cattle operations" seems to be in disagreement with the statement at the bottom of the paragraph. "Both the sheep and cattle industries appear to have reached maturity in the west. There is little indication of prospects for significant expansion." Also the reference to Field 1991 is not cited in the Reference Section so it is impossible to check the reference. Furthermore, statements like this should be used sparingly and conservatively, no one knows the future.

179-19

4.13

Under the paragraph The Rancher/Farmer desires to maintain traditional lifestyles does injustice to the farmers and ranchers these people are also deeply concerned about the environment, the condition of the resource area and the continued effort to improve the value, condition and ascetic value of the resource. They are also strong supporter of the multiple use concept and usually have a greater vested interest in the area than the young newcomer because the condition of the area can impact their heritage, livelihood and social values.

179-20

4.14

Table 4-3 Job Projections by Alternative, projections for Alternative E show a rather high impact to agriculture especially since several times in the document it is referred to as a minor or insignificant industry. It is not known how these figures are derived since under alternative E the number of livestock AUMs is supposed to stay the same.

179-21

4.16

Under the heading Impacts to Fish and Wildlife Habitat Resources the statement "Additional forage and increased numbers of watchable and hunting wildlife could generate an additional 63,400 per year to the local economy in expenditures for lodging, food, transportation, and equipment (Bangerter, 1991) This is seen as a beneficial impact." We think it must be realized that just because wildlife is there it is not certain that additional tourist will come view them, the tourism market may have already reached a maximum. Also the dollar figure has no documentation and once again the reference to Bangerter is unacceptable.

179-19 This section of Chapter 3 has been deleted as it does not add or detract from the intent of the analysis.

179-20 Table 4-3 of the draft has been deleted from this document. The model used to derive the data used in the table has limited applicability and was determined to be unsuitable for this project.

179-21 The word "could" was used to express the point of whether tourists would come to view additional wildlife. Our analysis is based mostly on increased hunting opportunities and the development of interpretive trails to enhance wildlife viewing.

4.17

179-22

Under the heading From Management Actions for Livestock Programs the statement "Negotiating with livestock permittees to eliminate domestic sheep use within a 10-mile buffer of identified bighorn sheep reintroduction areas has the potential to reduce the likelihood of disease transmission for domestic livestock to bighorn sheep. This would significantly increase survival rates for bighorn sheep." There is no reference to where the 10-mile buffer zone came from, after reviewing the available literature we could find no such reference, the Desert Bighorn Council Technical Staff 1990 in Guidelines for management of domestic sheep in the vicinity of desert bighorn habitat (Desert Bighorn Council 13 pp.) recommend a nine mile buffer. Some Bighorns in Nevada have been released with success with a two mile buffer. Besides the proximity to domestic sheep many other factors influence bighorn survival rates: Some recent research from the University of Idaho suggest Bighorns already carry the diseases that some are claiming they obtain from domestic sheep. The stress due to capture, transport, and release, and subsequent stress due to human activity, and forage competition with other wildlife can result in these diseases becoming lethal. Simply setting a ten-mile buffer will not guarantee success. Therefore the last statement in the paragraph "this would significantly increase survival rates for bighorn sheep" absolutely cannot be documented and should be stricken from the document.

4.17

179-23

Under the heading Impacts to Livestock Management Programs "improved grazing systems would result in an increase of 500 AUMs annually thereby positively affecting permittee's incomes" not only would this improve permittee's income in would also help the local economy, and the resource, ~~and~~ improve wildlife habitat and species diversity.

4.23

179-24

The last paragraph on the page "Assuming that 9.19 is the value of the forage consumed per AUM, 50,299 AUMs brings in 462,200 to the local economy annually." This is inconsistent with the statement of what the 9.19 value mentioned on page 3.53. This statement is what the value of forage is to the permittee and not the value the AUM has to the local economy which is

179-22 Please refer to our responses 110-10, 116-8 and 179-39.

179-23 Please refer to our response 3-24.

179-24 Please refer to our response 104-2.

179-24 Cont.

significantly more at $34.16 (Nelson 1991).

4.24

179-25

The first paragraph "Assuming $25 is the visitor use day value, then 190,000 recreation days will equate to 4,750,000 into the local economy annually." There is no documentation as to where the number of visitor days came from. Also we would challenge the statement to the local economy. This must include the Salt Lake metropolitan Area and parts of Colorado and Wyoming, Which shouldn't be considered the local economy.

4.26

179-26

Paragraphs 1,2,3 all make direct reference to the removal of livestock to benefit wildlife. This does not include management of livestock and wildlife to the benefit of each other and the resource area. It only allows that livestock and wildlife are not compatible which is in direct disagreement with literature on the subject.

4.26

179-27

Under the title Impacts to Livestock Management Programs first paragraph. Again no thought is given to management systems incorporating wildlife and livestock which have been shown in the literature to be beneficial to both.

4.26

179-28

Under the title From Management actions for Vegetation Resources. The figures are not validated and the reference to Bangerter is unacceptable.

4.27

179-29

The whole first column is implying the that livestock and wildlife are incompatible. This is very narrow minded thinking and is definitely not supported by any research or evidence. Also the figures of the cost to livestock industry are inaccurate and don't address the loss to the local economy.

4.30

179-30

Under title IMPACTS TO RIPARIAN HABITAT RESOURCES subtitled; From Management Actions for Livestock Programs. We agree completely with the statement "However not using livestock grazing to control noxious weeds on 18 percent of the early and mid ecological stage riparian areas, would result in weed expansions in riparian areas. These weed expansions could move ecological condition toward an earlier biogical stage." We also agree completely with the statement in the next paragraph. "Allowing

179-25 The visitor day number came from a report compiled annually by BLM. Estimates are made using visitor registers, car counters, UDWR hunting reports and estimates made by field personnel. Please refer to our responses 179-14 and 179-15.

179-26 The statement: "Where livestock management can be used as a tool to benefit wildlife, compatible grazing systems would be implemented" has been added to Chapter 4 under impacts from management actions for livestock management.

179-27 Grazing prescriptions are proposed as a tool to maintain or improve resources under the proposed plan and Alternatives A, C, and D.

179-28 Please refer to our response 179-16 above.

179-29 Under Alternative B, removing livestock to increase wildlife AUMs is one way to achieve the stated goals. It is not BLM's preferred method, however. Please refer to 104-2.

179-30 The same statement is not used under the other alternatives, because livestock could be used as a tool to control noxious weeds in riparian areas and to maintain or improve riparian values and wildlife habitat.

179-30 Cont.

wildlife forage to increase for wildlife use up to 67 percent from present forage use levels could causes unacceptable use on riparian areas, especially during drought years when wildlife would concentrate in wet areas. Livestock use could be controlled during these periods while wildlife are not easily controlled. Benefits to the riparian resource from reduced livestock grazing could be offsetby increased wildlife use." These statements we believe state very real concerns to simply reducing livestock AUMs as a panacea for everything. We wonder why they are not mentioned in other areas of the document.

179-31 4.31

Under the title From Management Actions for Vegetation Resources. We agree with the statement "Even with 100 percent allocation to watershed, this alternative would benefit watershed the least due to the low number of acres identified for vegetation treatment and the least amount of pinyon-juniper woodlands and sagebrush in mid ecological condition." This is a very good point.

179-32 4.33

The figures are inaccurate due to wrong assumptions about the value of an AUM to the local economy.

179-33 4.34

Column two again compares figures of loss to the livestock industry and gains made by recreation. These comparisons as stated are invalid. Also any loss to the livestock operators is also a loss to the local economy.

179-34 4.36

Column one, paragraph 3 we also agree with the statement "Vegetation management decisions in Alternative B allow only Biological control of noxious weeds and insects within the ACECs. This may cumulatively affect adjacent lands, via degradation and loss of desired vegetation composition and production levels, causing economic losses to state and private landowners".

179-35 4.37

Column two, top of the page. The statement "This would be a significant long-term negative impact to the majority of wildlife species within the resource area." How many and what species is the term majority referring to, and how are they negatively affected. According to

179-31 Thank you.

179-32 Again, please refer to our response 104-2.

179-33 Refer to 104-2.

179-34 Thank you.

179-35 Please refer to changes made in Chapter 4, impacts to fish and wildlife habitat from livestock for Alternative C.

179-35 Cont. the literature most species can benefit from livestock grazing.

4.38

179-36 Under the title Impacts to Livestock Management programs the statement about extra income to livestock permittees does not take in to account the positive economic impacts to the local economy.

4.39

179-37 Under heading From Management Actions for Livestock programs the statement "Cattle would congregate along the riverbank and adversely affect the visual quality of the corridor." This statement assumes first that cattle would congregate there and second that cattle somehow affect visual quality. This is a subjective viewpoint that would depend entirely on the viewer.

4.43

179-38 Column two Paragraph 2 and 3 appears to be mathematical error. Figures inaccurate due to previously stated reasons.

4.45

179-39 Column 2 last paragraph Statement "this would reduce or eliminate the successful return of Rocky Mountain Bighorn Sheep to their native habitat within the resource area". This statement is misleading and is not documented by scientific fact or evidence.

4.46

179-40 Under the title From Management Actions for Riparian Habitat Resources the statement "However, unfenced riparian areas could allow uncontrolled human and livestock use, resulting in continued deterioration of certain riparian areas in the resource area." This should also include a statement about uncontrolled wildlife use.

4.46

179-41 Under title From Management Actions for Vegetation Resources. Does not take into the account the value of the increase forage to the local economy or to wildlife.

4.50

179-42 Column 2 paragraph 4 the statement "Forage allocated to wildlife would remain at the current use of 27,600 AUMs." What about the addition 3,400 AUMs mentioned on 4.46 for bighorns and pronghorns.

179-43 4.52 Column one paragraph 4 and 5 wrong figures for previously stated reasons.

179-36 Please refer to our response 104-2.

179-37 We agree that the statement would depend entirely on the viewer. In this situation we are talking about a person that is floating on the river in a raft or fishing, picnicking or hiking along the river bank. We stand by our statement that cattle congregating along the river bank would affect visual quality in the area.

179-38 Please refer to our response 104-2.

179-39 This statement refers to the increased risk of disease transmission from livestock to bighorn sheep when livestock use is allowed in bighorn sheep habitat. This has been documented in the following scientific studies: Desert Bighorn Council Technical Staff, 1990; Spraker, T.R., 1977; Jessup, D.A., 1982, 1985; Foreyt, W.J., 1982, 1989; Onderka, D.A., 1988; Callan, R.J., 1990; Bunch, T.D., 1989; Sandova;, A.V., 1988; and Goodson, N.J., 1982.

179-40 Whether standard fences that control livestock are or are not used for riparian protection would not affect wildlife from using these areas. Concentrated wildlife use can have a detrimental effect on riparian areas, especially during drought. Please refer to impacts to riparian habitat resources from livestock program in Alternative B in Chapter 4.

179-41 Please refer to our response 104-2.

179-42 The paragraph on page 4.46 has been deleted.

179-43 Please refer to our response 104-2.

4.54

179-44 From Management Actions for Livestock Programs Again the claim for a ten-mile buffer with no documentation. In the second paragraph under this heading "Management actions would, overall benefit fish and wildlife habitat." Should also consider specific actions to manage wildlife to protect riparian areas.

4.54

179-45 From Management Actions for Vegetation Resources "Alternative E allows wildlife forage demand to increase from current levels of 27,600 AUMs to 40,000 AUMs a 31% increase" it should be mentioned that the vegetative treatments and other suggestions to provide additional forage should be implemented first before the wildlife is allowed to increase otherwise resource damage will result. Also the citation to Bangerter is not acceptable and the figures cannot be documented.

4.55

Under the title From Management Actions for Vegetation Resources. This section assumes addition forage for wildlife will come from range improvements and reduction in livestock AUMs. Livestock AUMs have already been reduced significantly and wildlife also winter much of the time on private ground it should not be the sole responsibility of the livestock owner to raise wildlife for the state. Any increases in wildlife should come after additional forage is provided and no more reductions in livestock numbers should have to be forced on the permittees. As in many cases livestock numbers are reduced then wildlife is allowed to increase above carrying capacity, resulting in resource damage which is blamed on livestock.

4.58

179-46 Under the title IMPACTS TO RIPARIAN HABITAT RESOURCES we agree with the management strategy presented in the statement " This improvement would be accomplished by implementing prescribed grazing practices conducive to riparian improvement, along with rangeland improvements and noxious weed eradication".

4.60

179-47 In column two, third paragraph there appears to be a mathematical error as a reduction of 9000 AUMs using the figure of 9.19 would equal a loss of 82,710 not the 11,500 dollar figure

9

179-44 Please refer to our responses 116-8 and 226-38. We would consider specific actions to manage wildlife to protect riparian areas if this became a problem.

179-45 Rangeland practices and grazing prescriptions would occur to provide additional forage in the proposed plan. Also preliminary monitoring indicates that the total forage available is close to meeting wildlife objective use and existing livestock preference levels. As stated in the document, reductions in livestock would be made on crucial wildlife habitat only after all management options are exhausted and only where there is a conflict between livestock and wildlife in meeting forage assignments shown by monitoring. It was assumed, as stated in Chapter 4, that achieving ecological condition goals through rangeland improvement and other management practices would provide enough forage for existing livestock grazing preference. The reference to Governor Bangerter has been corrected to USF&WS, 1985. Refer to the references section of this document for the full citation.

179-46 Thank you.

179-47 Refer to our response 3-24.

179-47 Cont. stated and the figure of 94,800 increase from tourism is not documented.

179-48 4.62 In paragraph 4 again the figures do not accurately reflect the impact to the local economy the reduction of livestock AUMs would cause. And over state the impacts of the possible increase in tourism would have to the local economy.

179-49 4.63 Paragraph 4 talks about the closure or heavy use restrictions imposed on livestock grazing within level 1 areas will result in a long-term ecological benefit to improved riparian ecosystem in these areas and water quality of the Green River drainage. What research or data is this based on, this is an open-ended statement with no substance. Riparian areas ought to managed as an area and not a small ecosystem excluded from the rest of the area. How is livestock grazing by itself affecting the water quality of the Green River? Is this implying the whole stretch of the Green River is being degraded by Livestock? Statements like this should be use conservatively and documented by data or research.

179-50 A8.18 This table is very general we realize it was done to save space in the document. However, it is extremely hard to understand the problems on the allotments when they are described in such general terms. The best solution would be a short statement individually describing each allotment its specific problems and possible management practices to solve the problem.

179-51 R.2 We could not find the citation by Godfrey E. Bruce anywhere in the document.

179-48 Refer to our response 3-24.

179-49 The sentence referred to has been omitted.

179-50 As you stated, the method used was intended to save space and the types of problems were intended to be general. Detailed objectives and problems by allotment will be stated and addressed at the activity plan level. Allotment management plans will be written, as funding provides, in a priority as listed on Table A8-5.

179-51 Bruce Godfrey was consulted during the writing of the economic analysis of the draft document, but none of his text information was used initially. In the final document Mr. Godfrey is cited as a reference.

NOTE: The comments from the Diamond Mountain permittees (comment letter #226) are responded to here. Approximately 200 original signatures were attached. For the sake of brevity only, these signature pages and accompanying reference section are not reproduced in this document. The entire letter, with signatures, is available for public review in the Vernal District Office.

RESPONSE TO COMMENT LETTER 180 (UTAH TRAIL MACHINE ASSOCIATION, Huck)

UTAH TRAIL MACHINE ASSOCIATION

CONSERVATION • COURTESY • SAFETY

March 24, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

RE: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement.

Dear Ms. Smalley:

The Utah Trail Machine Association represents the interests of all motorized recreational users of public lands in Utah. Over the past several years we have become increasingly concerned with the apparent trend among federal land managers to restrict motorized access to public lands even though there is no objective data indicating that such access has resulted in any disproportionate impact to the resource.

This trend is especially troubling considering that motorized users are singled out from all other classes of users for special restrictions. This is inappropriate because any type of use will have some kind of impact on the land. Foot travel, mountain biking, and horseback riding all leave their own unique imprint on the land. Yet when the BLM , as well as other federal agencies, formulate plans restricting access, only motorized users and their effects are addressed.

We are well aware that certain well financed and highly organized groups have made it a priority to attack motorized recreation on public land by developing and perpetuating a body of propaganda that greatly exaggerates the negative impacts of motorized recreation, while completely neglecting the impacts of their own chosen uses. It is your responsibility as professional land managers to make decisions that are not only based on factual information, but also are responsive to the needs of all classes of your constituents.

Also keep in mind that in the next few years approximately two millions acres of the most scenic land in our state will be withdrawn from multiple use and placed into the the most restrictive category of all: Wilderness. Because all motorized users will be totally excluded from these vast areas you should have an added incentive to maintain such access to the greatest possible portion of the remaining lands.

2

Motorized recreation is an important part of the economy of our state. The 1990 Utah OHV Survey found that motorized recreation adds 180 million dollars to our economy annually. The figures given in Table 3-23 show that motorized travel in the DMRA encompassed 54,200 hrs while non-motorized travel amounted to only 14,000 hrs. It is clear that reducing motorized travel opportunities will negatively impact a huge segment of your users.

180-1 We would suggest that if it becomes necessary to impose travel restrictions in any particular area, these such restrictions should apply to ALL forms of travel. If soils, wildlife, or plants in a region will be harmed by a passing motorcycle, then they will also be harmed by horses, mountain bikes, and troupes of hikers. A few quick calculations will reveal that the specific pressures exerted on the ground by horses' hooves, bicycle tires, and even hikers boots can greatly exceed those exerted by motorcycle or ATV tires. Furthermore, motorized users tend to make day trips, returning to a camp or to home to spend the night. Non-motorized users, on the other hand, due to their slower rate of travel tend to stay overnight, thereby increasing certain types of pollution. This is especially true of horse travel. All public land users should be included in any travel restrictions that you propose for the Resource Area.

We find the motorized travel restrictions suggested for the Red Mountain area unjustified and arbitrary. For many years this has been a popular destination for motorized users and there has been no objective data presented showing excessive impact from this use. The argument that certain resources COULD be impacted by motorized access is without merit and inconsistent with our system of laws and does not belong in any public document. If damage is occurring due to human activities in this area then it should be closed to ALL human access.

The protection of relict vegetation is cited as a reason to restrict motorized travel in the Red Mountain area. Page G.11 cites the following definition for relict vegetation:

> A vegetation community or area within a vegetation community relatively undisturbed by **human activities** to allow the community to progress towards it natural climax composition. (bold face added)

This definition in and of itself would compel the land manager to restrict all human travel in the area to be protected. To limit the closure to motorized travel is not only discriminatory but also defeats the purpose of the restriction.

180-1 It is not our policy to limit all users to an area unless there are impacts being created by all users. We prefer to address impacts and consider needed restrictions on an individual basis. Some give and take is normally required by all to accommodate the needs of others. Please refer to our response 13-1.

CONCLUSION:

180-2 We argue strongly AGAINST the adoption of Alternative B (Ecological Systems) It is a kind of watered-down wilderness management approach that totally ignores the needs of the vast majority of your constituents. You have a responsibility to serve the needs of the people who use these lands. There will be enough formal wilderness designated to achieve the whatever purpose is served by removing human activity from the public lands.

The Red Mountain area should remain open to motorized access as has been the case for many years.

We urge you to adopt one or a combination of the remaining alternatives together with increased sensitivity to the legitimate needs of those who desire or require motorized access to lands under your stewardship.

Thank you,

Rainer Huck, Ph.D.
President, UTMA

180-2 Thank you for your comment.

P.O. Box 592
Vernal, Utah 84078
March 30, 1992

Jean Sinclair, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Sinclair,

181-1 I am very concerned about the resource management plan for Diamond Mountain. Proposals A, B, C and D seem to be loaded to the desires of special interest groups. Short term profits and improper use of fragile land is not in the best interests of the people of Utah. The Federal Government and the State of Utah need to consider the alternative which will best benefit the majority of citizens. This choice should be Alternative E. It is the most sensible management plan. Our fragile desert environment needs to be protected, therefore I support the Uintah Mountain Club's proposals for the improvement of Alternative E.

181-2 I oppose any more land designed for phosphate mining in the Red Mountain - Ashley area. I would rather see more Level 1 and Level 2 management prescriptions.

181-3 Protective zones around sensitive archaeological and paleontogical sites should be included.

I hope the BLM will be sensitive to the land and the people rather than the needs of special interests.

Sincerely,

Roy Krubsack

Roy Krubsack

RESPONSE TO COMMENT LETTER 181 (KRUBSACK)

181-1 Thank you for your comments. Regarding phosphate mining, please refer to our response 61-2.

181-2 Please refer to our response 61-1.

181-3 Please refer to our response 177-4.

March 31, 1992

Good Morning.

I haven't comprehensively plowed through the whole Diamond Mountain Resource Management Plan, but here's an opinion anyway.

Of the five alternatives, Alternative E is clearly the best. The others are far too biased toward various single purposes. Even this good start can be improved, I think.

189-1 -- Please consider removing the area around the Taylor Mountain Road between Red Mountain and Dry Fork from eligibility for mineral development. That seems to be extraordinary ground for a number of reasons and deserves to be given some protection.

189-2 -- Maybe you could identify more land as Level 1 and Level 2. That would at least give more time to inventory the resource and be able to make more informed decisions on pockets of sensitive terrain. It's easier to preserve it than repair it.

189-3 -- Feel free to regulate access by ORV's. Nothing says that machines have the same access rights as people, especially in delicate areas.

189-4 -- Is there some way to give more emphasis to paleontological and historical values? How can already identified sites be protected?

Again, Alternative E seems to be the best bet. I congratulate you on your work; it's lots of information about some pretty great country. Please keep me informed on further developments in the planning process. Thank you very much for your time.

Sincerely,

Day DeLaHunt

Day DeLaHunt
PO Box 69
Jensen, UT 84035

RESPONSE TO COMMENT LETTER 189 (DELAHUNT)

189-1 Thank you for your comment. Please refer to our response 61-2.

189-2 Please refer to our response 61-1.

189-3 The proposed plan does outline the OHV designations for the resource area. Please refer to the interim OHV map enclosed in Map Packet #10 for the graphic depiction of the designations.

189-4 The map in Chapter 3 identifying highly sensitive paleontological areas has been expanded to include additional areas. The criteria used in the draft for allowing collection of this resource has been strengthened to give more protection to the resource. More frequent visits to important paleontological and histoic areas by BLM personnel would provide a greater degree of protection for these resources.

Dinosaur Land

DINOSAUR NATURAL HISTORY MUSEUM AND DINOSAUR GARDENS

VISITORS' CENTER, DINOSAUR NATIONAL MONUMENT

ASHLEY NATIONAL FOREST

FLAMING GORGE RECREATION AREA

VERNAL AREA CHAMBER OF COMMERCE

134 WEST MAIN VERNAL, UTAH 84078 (801) 789-1352

March 27, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Ut. 84078

Dear Team Leader Smalley:

190-1 From what we have been able to learn in general about the Diamond Mountain Resource Area Resource Management Plan And Environmental Impact Statement Draft, we prefer alternatives A or E over alternatives B,C and D. We are not prepared at this time to make comments on specific aspects of the draft but we have encouraged our members and committees to participate as they feel appropriate on their own behalf.

We appreciate very much the efforts made by the bureau, its director and staff to keep us informed of the progress of this very important project.

Sincerely yours,

Mark Foley
President
sn

RESPONSE TO COMMENT LETTER 190 (VERNAL AREA CHAMBER OF COMMERCE, FOLEY)

190-1 Thank you for your comment.

March 30, 1992

Penelope Smalley
Bureau of Land Management
Vernal District
170 South, 500 East
Vernal, UT 84078

Dear Ms. Smalley,

191-1 I appreciate the opportunity to comment on the BLM's proposed Diamond Mountain Resource Management Plan. I support Alternative E, only if it is extensively amended. Before I detail the suggested amendments, I must express my general dismay at the apparent one-sidedness of the alternative. I feel it fails badly to provide a full spectrum of varying degrees of development on the land. In particular, a pitifully small area is slated for very protective management, whether it be for watershed protection, recreation, or wildlife. I would like to see much more land designated level 1 and 2. I also support the Uintah Mountain Club's proposal, which seems to me a true compromise.

191-2 The slickrock area north of Steinaker Reservoir should be closed to motorized vehicles, except for the existing road to the top of Red Mountain. This slickrock, with arches, and alcoves, is a very unusual area for northern Utah. It is the closest natural area recreation to Vernal, and I go there about 10 times per year. I also take student groups there, in the Earth Sciences Field Studies classes. Limiting access would protect the area, but it is, and still would be, accesible to anyone capable of walking up easy paths for short (less than 1 mile) distances.

I feel the only legitimate conflict here is between motorized versus non-motorized recreation. The mineral resources (e.g., phosphatic rock) appear far too deeply buried for economic recovery. The rock itself is not liable to such habitat or range improvement. Inasmuch as nearly all of the resburce area will be open to motorized vehicles, includin part of this area, then I feel non-motorized recreation should be the highest use at Level 1.

191-3 Protection zones restricting surface activities around archaeological and paleontolgical sites should be established, along with enforcement of laws to protect our public resources. These sites are numerous throughout the slickrock area, both behind Steinaker and Redfleet.

RESPONSE TO COMMENT LETTER 191 (ELDER)

191-1 Please refer to our response 61-1.

191-2 Please refer to our response 79-2.

191-3 Please refer to our response 177-4.

191-4 If the land in Diamond Breaks and West Cold Springs WSA's are not designated as wilderness, then this land should be placed into the Browns Park ACEC. Both the Upper and Lower Green River would benefit from Wild and Scenic designation.

191-5 The riparian area and canyon of Dry Fork around Alma Taylor Hollow should be a Level 1 recreation area, with non-motorized recreation the highest use. In this area is an extensive riparian forest, the large springs of Dry Fork, as well an informal trail system up Alma Taylor Hollow.

191-6 The Endangered Species Act should be followed when dealing with;

- the riparian zones of the Middle and Lower Green River (for the 4 endemic fish, and roosting of wintering bald eagles)
- The slickrock canyons and pinnacles behind Steinaker and Redfleet (peregrine falcon eyries)
- The riparian areas of Ashley Canyon, Dry Fork Canyon, and the riparian areas of the slickrock canyons (Spiranthes and silverspot)

Sincerely,

Tom Elder

191-4 Please refer to our response 77-5. Both the upper and lower Green River segments are recommended for wild and scenic river designation in the proposed plan.

191-5 Dry Fork Canyon around Alma Taylor Hollow has been identified as a developed recreation site. OHV use is limited to designated roads and trails. It has been identified as a no surface occupany area for leasable minerals. It also has been closed to grazing by livestock. It is our opinion that designating the area as level 1 would be unnecessarily restrictive to recreation development of the area.

191-6 Please refer to Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, for a discussion of the Bureau's responsibilities under the Endangered Species Act.

March 31, 1992

BUREAU OF LAND MANAGEMENT
Vernal District Office
170 South 500 East
Vernal, UT 84078

REGARDING THE DRAFT DIAMOND MOUNTAIN RMP WHICH WAS RECENTLY SENT TO ME, I WOULD LIKE TO GIVE YOU MY RECOMMENDATION IN THE RED MOUNTAIN AREA.

THIS AREA HAS BEEN USED IN A MULTI-USE CLASSIFICATION FOR YEARS. THIS AREA IS MOSTLY SANDSTONE, WHICH IS NOT SUBJECT TO DESTRUCTION FROM VEHICLES, HORSES OR HIKERS.

THERE HAS BEEN CATTLE, WILDLIFE AND MANY OTHER TYPES OF ACTIVITY IN THIS AREA. THE STATE OF UTAH CREATED SOME OFF ROAD TRAILS FOR ORV USE AND THESE ARE USED EXTENSIVELY, NOT ONLY BY LOCAL PEOPLE, BUT MANY FROM OTHER AREAS ARE USING THIS PUBLIC LAND FOR RECREATIONAL PURPOSES.

AS FAR AS I CAN DETERMINE, THERE HAVE NOT BEEN CONFLICTS BETWEEN DIFFERENT GROUPS OF PEOPLE, SUCH AS HORSES VERSUS ORV USERS. ALL TYPES OF PEOPLE SEEM TO ENJOY THE AREA AND COOPERATE WHILE USING THIS AREA.

192-1 THE SMALL AMOUNT OF EROSION DAMAGE SEEMS TO BE NEGLIGIBLE OR EASILY REPAIRED . I WISH TO RECOMMEND TO THE BLM THAT THEY LEAVE THE PRESENT CLASSIFICATION OF THE RED MOUNTAIN AREA AS IS, WHICH I BELIEVE WILL SERVE THE CITIZENS BEST.

SINCERELY,

Norman C Pease

NORMAN C. PEASE
2293 West 1000 North
Vernal, UT 84078

RESPONSE TO COMMENT LETTER 192 (PEASE)

192-1 Thank you for your comment. Please refer to our response 10-1.

March 31, 1992

Penelope Smalley
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Attention: Penelope Smalley

We became aware of this Diamond Mountain Resource Plan a few weeks ago. We have looked at it and tried to understand it, but, frankly, it is so complicated it is unfair to expect an informed opinion of much of it.

193-1 One thing we did notice is the introduction of bighorn sheep could limit grazing. This is not right. We don't market and eat bighorn sheep.

193-2 Also we don't understand the black-footed ferret issue but it seems it will have an impact on use of livestock that would be restrictive.

We do not directly run livestock, but our family does and we share acreage on Diamond Mountain. So we are interested in changes that would affect this area. We have an interest in the Little Hole and do not think the range condition is unsatisfactory, as listed in this plan. It is our experience that a farmer or rancher who provides a living from the very land he uses, tries to manage the resources to the best advantage.

193-3 We are concerned about the cost involved in producing this management plan and huge volume. Also, it is interesting that little to no imput is included from those who actually work on and care for the land and resources and from private land owners included in the study.

193-4 We are concerned about the restrictions that could be placed on private ground and limits to livestock permits. Before any of these alternatives are considered those directly involved should have more imput.

Sincerely,

Pam Whitmire
Clifford W. Whitmire

Clif and Pam Whitmire
2611 South Vernal Avenue
Vernal, Utah 84078

RESPONSE TO COMMENT LETTER 193 (WHITMIRE)

193-1 We believe the reintroduction of native species could be accomplished without significantly affecting the livestock industry. Reintroductions would also be consistent with other federal and state land management agencies' goals of restoring bighorn sheep to their historic range. Please refer to our responses 116-8 and 178-11 for further information.

193-2 Refer to pages A2.10 and A2.11 for the proposed black-footed ferret reintroduction guidelines. Under the proposed plan there are no significant impacts to livestock grazing resulting from these guidelines.

193-3 Thank you for expressing your concern. Public input from all the public land users has been sought and received throughout the RMP process. Specifically, input has been sought and received during the initial scoping period, to identify issues of concern to the public land users; in the development of the planning criteria, the guidelines in the development of the alternatives, and, in the development of the alternatives themselves. It is our opinion that the draft RMP and the proposed plan/final EIS adequately reflects the input from the public land users received during the public scoping period at the beginning of this project.

193-4 No restrictions outlined under the proposed plan or any alternative would be applied to private land. Livestock permittees will continue to be directly involved in management of their allotment.

March 30, 1992

Penelope Smalley
Bureau of Land Management
Vernal District
170 South, 500 East
Vernal, UT 84078

Dear Ms. Smalley,

I am a concerned citizen interested in the best possible long term management of our federal lands, and would like to support Alternative E for the BLM's proposed Diamond Resource Management plan. This alternative seems more balanced than the others. In addition, I would like to see some modifications to it to make it better.

194-1 There are several issues only partially addressed in Alternative E. First, I would like to see more lands in level 1 and 2. In particular, the Uintah Mountain Club's proposal seems to me a reasonable compromise, which would allow more protection than Alternative E alone would provide. Also, the slickrock area north of Steinaker Reservoir should be closed to motorized vechicles as this is a very unusual area for northern Utah. The area adjoining Moonshine Arch consists of spectacular slickrock which has been abused because of motorized access. I hiked there in
194-2 November, and there were several areas where slickrock had been spray painted with lots of beer cans and trash on the ground. Limiting access would provide some protection from this type of abuse. In addition, the BLM would do well to consider the acquisition of State Section 16 in the Red Mountain Area to help preserve this slickrock area. Some private lands should also be acquired.

194-3 Protection zones restricting surface activities around archaeological and paleontological sites should be established, along with enforcement of same to protect our public resources.

194-4 I have no problem with ORV use in general, but it seems to make sense to me to concentrate ORV use in areas less sensitive to long term damage than the present proposals allow. It seems to make no sense to allow ORV use on all lands within the Diamond Mountain Resource Area.

194-5 If the land in Diamond Breaks and West Cold Springs WSA's are not designated as wilderness, then this land should be placed into the Browns Park ACEC.

RESPONSE TO COMMENT LETTER 194 (OLSON)

194-1 Please refer to our response 61-1.

194-2 Please refer to our response 70-1.

194-3 We are not planning to establish 200-foot extended protection zones around archeological or paleontological sites in the proposed plan, but the sites will be protected.

194-4 OHV use will be allowed on the less sensitive areas in the resource area without restrictions. However, on sensitive areas this use will be limited during critical time periods to protect important resource values. Examples of these are deer wintering areas and critical soils during wet periods. There are several areas in the resource area where OHVs are prohibited yearlong. Please refer to the OHV map provided in Map Packet #10.

194-5 Please refer to our response 77-5.

194-6 Both the Upper and Lower Green River would benefit from Wild and Scenic designation.

Sincerely,

David P. Olson

194-6 Thank you for your support.

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS AND RECREATION

Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Jerry A. Miller
Division Director

1636 West North Temple, Suite 116
Salt Lake City, Utah 84116-3156
801-538-7220

March 30, 1992

David E. Little, District Manager
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Dear Mr. Little:

As curator and park manager at the Utah Field House of Natural History State Park in Vernal, Utah, we are frequently involved in the evaluation of paleontological resources on BLM land in the area. This letter is in response to your request for a review of the draft Resource Management Plan/ Environmental Impact Statement for the Diamond Mountain Resource Area. Your Alternative E seems to be the most acceptable management plan. However there are a few points that we would like you to further consider.

195-1 PALEONTOLOGY: Map 2-7, Table 2-18 Alternative E, defines several ACECS. Known paleonotologically sensitive formations, with known fossil localities, are found in several of these areas (as defined by Map 3-3). More detail is needed under the Browns Park Complex (Miocene vertebrate fossils from the Browns Park Formation); Red Mountain-Dry Fork Complex (Mesozoic vertebrate fossils - see my expanded list); Pariette (Uinta Formation badlands - Eocene mammals).

195-2 Table 2-13: Surely there is a misprint under Cultural and Paleontological Management Alternative E. Protection zones should be established for paleontological and cultural resources, with vertebrate fossil collecting only allowed by permit. Casual collecting of invertebrates and plant fossils using hand tools could be allowed with BLM permission (check in with you prior to going into the field). Surface disturbance by OHV use should be kept to a minimum in these zones. Type localities for numerous mammal fossils and some other vertebrate material are known from the Diamond Mountain Resource Area. To not protect these areas would be considered very poor management by the scientific community at large.

195-3 Table 3-2 Highly (to moderately sensitive depending on the area) formations for paleontological resources. In the last few years paleontological researchers have discovered significant vertebrate fossils and traces in this area (see enclosed figure). If you need references regarding this data, please contact us. Therefore, please add these formations:

Carmel Formation - Middle Jurassic - Presence of heretofore unknown dinosaur footprints

RESPONSE TO COMMENT LETTER 195 (STATE OF UTAH, DIVISION OF PARKS AND RECREATION, Bilbey & Hamblin)

195-1 Thank you. This information has been added to Chapter 3.

195-2 This table has been corrected. Inventories for paleontological resources will be conducted on highly sensitive areas before surface disturbing activities are allowed to take place. If paleontological resources are found, impacts will be mitigated through avoidance or exacvation. At this time OHV use will be allowed to continue.

195-3 Thank you. Both the table and map have been modified to include the new data you provided.

195-3 Cont.

Curtis Formation - Late Jurassic - Presence of marine reptiles, both types the first found in Utah of this age. (Ichthyosaur and Pliosaur)

Mowry Formation - Early Cretaceous - Presence of the first known perch (Beryciforme fish)

Frontier Formation - Middle Cretaceous - Presence of heretofore unknown dinosaur footprints.

Wasatch Formation - Early Eocene - Reptile and mammal fossils, some of the earliest primates. Aided in the definition of mammal ages.

Browns Park Formation - Miocene - Mammal fossils (*Gomphothere*, camel, horse, etc.)

The definition of Tertiary mammal ages was determined by fossils collected from the Uinta, Duchesne River, Bridger, and Wasatch formations from the Uinta and Green River Basins.

195-4 Table 4-18: Summary of Impacts: Alternative E would be best, perhaps with additional recognition of sensitive areas which could be managed more rigorously, e.g. the anticlinal nose of Split Mountain where the Morrison Formation is well exposed and is known to contain vertebrate fossils. See the enclosed map that outlines paleontologically sensitive areas.

195-5 WATER: Although you consider the potential for contamination of the ground water from a number of sources, you do not discuss potential for destruction of the aquifer itself. Mining, particularly west of the on-going phosphate operation, places the ground watershed at risk. Much of the annual flow into the valley's aquifer comes from water flowing into caverns in the limestones of the Mississippian and Pennsylvanian formations. These caverns honeycomb under the Park City Formation. Blasting associated with mining collapses these caverns, destroying inlets for the groundwater. Water is our most precious commodity in this desert. Most of it is being carefully managed; let's protect these caverns and the aquifers as well.

I hope that this further information will assist you in preparing the final draft of the Diamond Mountain Resource Area Management Plan.

Sincerely,

Sue Ann Bilbey

Sue Ann Bilbey, Curator

Alden Hamblin

Alden Hamblin, Park Manager
Utah Field House of Natural
History State Park
235 East Main
Vernal, Utah 84078-2605
(801)789-3799

195-4 Please refer to our response 195-3 above.

195-5 Please refer to our response 61-2.

1060 4th Ave
Salt Lake City, Utah 84103-4122
March 27, 1992

Ron Trogstad
Diamond Mountain Resource Area Manager
170 South 500 East
Vernal, Utah 84078

Dear Mr. Trogstad:

196-1 I am writing in regard to the Diamond Mountain Resource Management plan currently under review. Please adopt a plan which will enhance ecological and cultural values which in turn will enhance low impact recreation opportunities.

The time I spend each year backpacking in the Uinta Mountains and rafting the Green River are tied to the Diamond Mountain Resource Area. The wildlife I see in the Uintas depend on the Diamond Mountain area for winter forage and the water quality of side streams entering the Green River depends on well managed land. Driving through herds of cattle on overgrazed land on the way to the Island Park put in last year marred the experience of a couple of friends from Vermont we were introducing to Utah rafting. Please increase the wildlife grazing allocation to balance the livestock allocations.

I want to thank you for opposing unfair hunting methods like bear baiting and I ask that the management plan be compatible with wildlife reintroductions including the blackfooted ferret. I want to ask for alternative livestock grazing levels that will allow better range management, so that vegetation treatment will not be necessary. Please limit any vegetation treatments to natural methods such as fire.

I would like to see off road vehicle use strictly limited under the new management plan. I do not think that sale or transfer of critical wildlife habitat should be allowed. I would like to see the Green river protected as a wildlife corridor and considered for more Wild and Scenic River protection. I hope mineral leasing can be strictly limited especially in productive wildlife lands and I hope low potential for mineral development will be equitably balanced against the high cost of environmental damage. This issue of mineral development is especially close to me because of damage I have witnessed in an area in which I once spent much time hiking.

Thank you for your consideration of my comments.

Sincerely,

Ron Raunikar

RESPONSE TO COMMENT LETTER 196 (RAUNIKAR)

196-1 Thank you for expressing your concerns. We believe the proposed plan is the best balance of protective management while allowing compatible uses within the resource area.

March 31, 1992

Dear Mr. Trogstad,

It has come to my attention that the BLM has released for public comment a draft Environmental Impact Statement and Resource Management Plan which address the Diamond Mountain Resource Area in northeastern Utah. My purpose in writing to you is to urge you to support the preservation and/or enhancement of the area's natural integrity, by deemphasizing the potential for continued resource exploitation and/or development. I feel this area hosts many important archaeological, wildlife, and recreational values--and most importantly, it contains habitat for several endangered species (i.e. Colorado River squawfish, humpback chub, razorback sucker, bald eagle, peregrine falcon, and whooping crane).

In my opinion, alternative B of the draft EIS, would be the best choice, and alternative E would rank second out of the five proposed, even though several improvements and clarifications are needed. Specifically, these improvements are:

197-1 1. Further reductions in the number of AUM's allocated to domestic livestock.

197-2 2. Implementation of better range management instead of employing vegetation manipulation for improving the range condition--and if treatments are absolutely necessary, do them with prescribed burning, a natural method.

197-3 3. Opposition to any black bear baiting as an acceptable hunting method.

197-4 4. Close the entire Diamond Mountain area to all mineral development--and if that is not possible, at least close all of the proposed Browns Park Complex and Nine Mile Canyon Areas of Critical Environmental Concern, the Ouray National Wildlife Refuge, and the Wild and Scenic River candidate rivers, to any type of mineral leasing, and even the no surface occupancy stipulations could later be waived. (I understand the Resource Management Plan lists the mineral potential on Diamond Mountain as low.)

197-5 5. Study the entire length of the Green River in the Resource Area for Wild and Scenic designation, as it serves as a critical habitat and travel corridor.

197-6 6. Close all riparian, proposed ACEC's, Wild and Scenic Rivers, and the two Wilderness Study Areas north of Browns Park to Off-Highway Vehicle use, except on existing and designated roads.

197-7 7. Consolidate land holdings on Diamond Mountain, instead of further confusing land ownership patterns by trades.

In short, I strongly support the ACEC recommendations, the Wild and Scenic River study for all of the Green River, and a "no lease mineral" recommendation on sensitive lands. Please lend a listening ear, and take the courage to stand up to the seemingly overwhelming pressure from commodity interests. Thank you for your attention.

Sincerely,

James W. Thompson
3901 South Viking Road
Salt Lake City, Utah
84109

RESPONSE TO COMMENT LETTER 197 (THOMPSON)

197-1 There have been significant livestock reductions in the past as stated under the "Forage Allocation History" in Appendix 8. This data has shown that we are very close to meeting both livestock preference and wildlife proposed increases under the proposed plan. Range improvement and management practices would provide the additional forage necessary to fulfill the requirements. Refer to Table 2-15, under vegetation, regarding forage assignment criteria.

197-2 Vegetation manipulation is an approved tool in range management. Refer to vegetation resources under Management Guidance Common to the Proposed Plan and the Alternatives in Chapter 2, and the 1991 bureauwide Vegetation Treatment EIS, available at each BLM office. Also refer to Appendix Table A8-4 for prescriptions of the major treatment methods planned.

197-3 Please refer to our response 114-34.

197-4 We believe it is unnecessary to close the entire Diamond Mountain, the proposed Browns Park and Nine Mile Canyon ACECs and recommended wild and scenic river segments to all mineral development. The proposed management levels and mineral categories for these areas are adequate to protect the important and crucial resource values while allowing for responsible resource development.

197-5 The entire length of the Green River in the resource area was evaluated for possible inclusion into the wild and scenic river system. Based on criteria set forth in the Wild and Scenic Rivers Act, it was our determination that the upper segment, through Browns Park to the Colorado state line, and the lower segment, between the public land boundary south of Ouray to the Carbon County line be recommended for designation as wild and scenic river segments. Because of conflicts and local opposition to designation of the segment between Dinosaur National Monument and the public land boundary north of Ouray, a determination was made to drop this segment from further consideration. Please refer to Appendix 7.

197-6 Please refer to our response 177-7. It is not our policy to close large areas to OHV use because they are called ACECs, Wild and Scenic Rivers, or wilderness study areas, etc. We prefer to identify particular problems within these areas and change or limit the type of use that are aggravating or causing the problem. Using this approach some areas can remain open to OHV use within these important areas.

197-7 Please refer to Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, for land ownership dispositions.

295 Crossbow
Green River, Wy 82935
February 18,1992

Mr. David Little
District Manager
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Mr. Little:

198-1 I would like to make some comments about the Resource Management Plan. After communicating with Questar, I found out they paid Metcalf Archaeological $222,669. for the archaeological work they did on the recent pipeline across Browns Park. Mapco paid about the same amount for their pipeline and Cheveron has two pipelines across Browns Park. This adds up to nearly a million dollars paid for archaeological work required by BLM. Did the taxpayers get a million dollars worth of information out of these studies? Where are the artifacts and reports? In the same report from Questar it appears they spent $400,000. for the Jensen River Bore instead of about $40,000. for a wet crossing. This was to save the humped back chub. Is the Bureau of Reclamation still going to raise the amount of water released from Flaming Gorge to save the humped back chub this summer? Is this wasting water for irrigation and water for power? Questar spent $42,346 looking for the Black Footed Ferret along the pipeline. Questar paid $67,861 to Greystone Consultants for an environmental Assessment. Driving along any highway or dirt road in this area you will notice cows and wild game feeding in pipeline right aways and you see more game around the Cheveron Phosphate mine than anywhere else. It is obvious these companies are improving range conditions. Do we need environmental assessment statements or bonds to be sure reclamation is completed after construction? No matter how you look at it taxpayers eventually have to pay for these studies. No wonder we have such inflation in this country.

After the first pipeline went across Browns Park, was there any additional information gained in the following three pipelines, or did BLM just give the companies an excuse to raise the rates.

I think the BLM should publish each year what each company has to spend to satisfy government requirements that is not related to the actual construction of each project. BLM should publish each year what it costs in such projects as saving the Humped back chub, looking for Black Footed Ferrets, and saving the spotted owl.

If we are going to stay competitive with foreign markets, we are going to have to keep our cost down in the manufacturing of each product. Fuel is certainly a necessary requirement for any manufacturing product. I believe this information would help our legislators have the whole picture and the USA would not become a second rate country. Gas rates are high enough lets be sure studies are going to benifit taxpayers before requiring them.

Sincerely,

Allen Crane

RESPONSE TO COMMENT LETTER 198 (CRANE)

198-1 Thank you for your comments.

3-31-92

BLM
VERNAL UT

RE: CLOSURE OF RED MOUNTAIN

DEAR BLM,

LAST SUNDAY, MARCH 29, 1992 5 OF MY FRIENDS AND I RODE MOTORCYCLES ON RED MOUNTAIN. OUR PURPOSE WAS TO ASCERTAIN THE "DAMAGE" DONE BY OUR RIDING IN THIS AREA LAST FALL.

WE SPENT THE WHOLE DAY, AND THIS IS A SUMMARY OF WHAT WE FOUND.

204-1 1) FEW OF THE TRAILS WERE STILL VISIBLE BUT NOT HIGHLY VISIBLE

2) SOME TRAILS HAVE BEEN KEPT ALIVE BY GAME, MANY OF WHICH WERE GAME TRAILS ORIGINALLY.

MY QUESTIONS TO YOU... IS BLM SUPPOSED TO STAND FOR "PUBLIC" LAND MANAGEMENT? DO SOME SPECIAL INTEREST GROUPS RATE HIGHER THAN OTHERS? CAN BLM ACTUALLY SHOW US THE DAMAGE WE HAVE DONE?

~~IT~~ I TRULY FEEL THAT I AM

RESPONSE TO COMMENT LETTER 204 (BEERS)

204-1 Please refer to our response 10-1.

A RESPONSIBLE LAND USER. I DO NOT LITTER, I TRY TO LEAVE THE LAND BETTER THAN I FIND IT AND I DO NOT UNDERSTAND THE CLOSURE OF AN AREA THAT IS UNDAMAGED BY MY USE. 204-1 Cont.

SINCERELY,

David Beere

PRESIDENT, VERNAL COALITION FOR RESPONSIBLE LAND USERS

March 20, 1992

Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Ut. 84078

Subject: Diamond Mountain Resource Management Plan Draft E.I.S.

I must commend you and your team for the comprehensive effort in creating the Draft EIS of the Diamond Mountain Resource Management Plan.

After close review of the Diamond Mountain Resource Management Plan, I favor Alternative E, although I have concerns about the following Topics:

205-1 Phosphate Leases in the Red Mountain-Dry Fork Complex.

This is a very unique area because of it's wide diversity of high quality resource values within a close proximity to an urban area. It will be very important to determine the best use of this land. To do this we must first identify the resources of the area. The resources of the Red Mountain-Dry Fork complex are:

1. Recreation (Hunting, Fishing, Camping, Picnicing, Hiking, Riding of Horses, Bicycles, Snowmobiles, and OHVs)
2. Scenic Vistas and Aestetics
3. Riparian Areas
4. Wildlife Habitat (Including crucial winter range for Deer and Elk)
5. Cultural and Historical Resources
6. Watershed (Surface and Underground Aquafer)
7. Vernal Area Municipal Water Supply
8. Archeological and Paleontological Sites
9. Biological Diversity
10. Relict Vegetation

RESPONSE TO COMMENT LETTER 205 (PERRY)

205-1 Please refer to our response 112-1.

ACEC designation is in tune with the best use of these lands. In light of critical resource values identified in the ACEC nomination for this area, no alternative addresses the impacts to these resources should mining occur. Alternatives B, C, and E designate the Red Mountain, Dry Fork Complex as an Area of Critical Environmental Concern. However, withdrawls for this area have not been considered. The potentially unacceptable impacts from mining in the Red Mountain-Dry Fork Complex are as follows:

205-1 Cont.

1. Changes to Municipal Water Supply Aquafirs
2. Changes to the 100 Year Flood Plain
3. Changes to Local Springs
4. Noise from Blasting and Equipment
5. Degradation of Scenic and Environmental Values
6. Degradation of Property Values

For these reasons mineral leasing is incompatible within 100% of the lands in the Red Mountain-Dry Fork Complex, a total of 25,800 acres. This area is mapped on page 2.111 of the Draft EIS for the Diamond Mountain Resource Management Plan dated November 1991.

The Diamond Mountain Resource Management Plan should recommend withdrawl of mineral leasing for this area at the expiration of the current lease period.

Red Mountain

205-2 Motorized Travel should be allowed on Red Mountain, but restricted to existing roads.

Moonshine Arch

205-3 The area north of Steinaker Reservoir known as Moonshine Arch has suffered degradation due to motorized travel. This area should be closed to motorized travel.

Wild and Scenic River Designation on the Green River

I strongly support designation of the Green River Segments from Little Hole to the Colorado State Line, and Ouray to the Carbon County Line for inclusion in the National Wild and Scenic River System. The recreational and socioeconomic benefits of this designation cannot be overstated.

205-4 In Daggett County there is no doubt rafting the Green River is a major factor in the local economy. People come from all over the world to fish the river. Inclusion in the Wild and Scenic Rivers System would provide much needed facilities at Little Hole, Indian Crossing, Taylor Flat, and Swallow Canyon. Not to mention river camps in between. More importantly it would eliminate the threat of roads and dams in the river corridor.

The lower section is prime habitat for Colorado Squawfish, Humpback

205-2 Please refer to our response 10-1.

205-3 Please refer to our response 10-1.

205-4 Thank you for your support.

205-4 Cont

Chubs, Bonytail Chubs, and Razorback Suckers. It is also used quite heavily as a white water rafting recreation area. River running is a major factor in the economy of Green River, Ut.

These rivers need to be protected to the best of our abilities. The BLM needs to take an active part in seeking Wild and Scenic River status for both of these areas.

Black Footed Ferrets

The current management plan allows 19,000 acres for reintroduction of Black Footed Ferrets in the Sunshine Bench, Shiner, Antelope Flat, Twelve Mile, and the Buckskin Hills. None of these areas are high priority oil and gas producing areas.

205-5 In the DMRMP Draft it is stated that it takes 125 acres of prairie dog town to sustain one ferret. If this is true then 19,000 acres should sustain 152 ferrets. This is probably more ferrets than we can expect to reintroduce during the life of this management plan.

Although I favor Alternative E, I cannot support the additional 14,000 acres of ferret habitat this alternative provideds, in the high priority oil and gas producing lands south of Myton.

Rocky Mountain Big Horn Sheep

205-6 Your choices for Big Horn Sheep habitat are good, but I question the 10 mile buffer zone between Big Horn Sheep and Domestic Sheep.

I look forward to working with you in developing the Diamond Mountain Resource Management Plan.

Thank You,

Russ Perry
Sara Perry

Russ Perry
Sara Perry
11090 N. Dry Fork
Vernal, Ut.

205-5 Alternative A would allow for the reintroduction of black-footed ferrets in the Twelve Mile area which has been classified as a high potential oil and gas area. Guidelines for reintroduction of ferrets have been outlined in Appendix 2 of the document and define timetables and numbers. BLM anticipates the success of captive-raised ferrets would continue and that an ample supply would be available. The proposed plan has been changed to maintain 16,600 acres on Eight Mile Flat as the primary release site. If another potential area is determined to provide a better opportunity for a successful reintroduction, it would be selected and Eight Mile Flat removed from further consideration. Our most recent data indicates that Eight Mile Flat is the best site for reintroduction and it also happens to be a high oil and gas producing area.

205-6 Please refer to our responses 116-8, 110-10, and 178-11.

3/26/91

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 S. 500 E.
Vernal, UT 84078

Dear Team:

In regards to the Diamond Mountain Resource Management Plan, I support Alternative E. I support the Uintah Mountain Club's proposed improvements for Alternative E.

207-1 I am especially interested in more protection for the slickrock north of Steinaker reservoir. My family and I spend many evenings exploring that area, and often take visitors to moonshine arch. We are in the habit of taking trash bags to collect garbage found in the areas presently accessable by off-road vehicles. I would like to see the private lands at the access to this area acquired so it can be managed properly and closed to off-road vehicles. I have seen the stakes indicating your research into this area, and appreciate the interest.

207-2 I also appreciate the re-introduction of the bighorn sheep, and your plans for introduction of the black-footed ferret.

207-3 As a kayaker and canoeist, I have spent a lot of time on the Upper and Lower Green River, and would like to see these achieve Wild and Scenic Status. This is another local area where I am proud to take visitors.

Sincerely,

Sally Wackowski Ronald K. Wackowski

Sally Wackowski & Ronald Wackowski
1936 E. 1375 S.
Vernal, Ut 84078

RESPONSE TO COMMENT LETTER 207 (WACKOWSKI)

207-1 The Red Mountain recreation area, as outlined in the proposed plan, would include the slickrock country north of Steinaker Reservoir. A recreation management plan would be prepared for this area outlining specific management objectives to provide for numerous types of recreation activities while protecting the important resource values of the area. Also please refer to our response 79-2.

207-2 Thank you for your comments.

207-3 Thank you for your support.

Dear Jean Sinclear:

208-1 The Bureau of Land Management is planning to build a road up over Mames Hole and down into Lambson Draw. They are also planning to build a campsite in Bear Hollow. I think it is wrong, because it

208-2 will allow people to drive through private land, and be a hazard to the environment.

First, the proposed road, and campsite are a hazard to the environment. There will be litter and pollution in the water, and people will tear up the roads and trails. Also the BLM is planning to burn two hundred acres of land. When Joseph Hacking, my great grandfather, owned that land he tried to burn. He waited until the weather was just right for burning. He had just gotten the fire started, and under control when a big gust of wind came up and the fire ran wild.

Second, the land where they plan to build the road, and campsite is private land. The land has been in the Hacking family for ninety-two years. Joseph Hacking used it to run sheep; and Grant Hacking, my grandfather, uses it to run his cattle.

Third, the Hackings have tried not to let it get over grazed. The many reservoirs have all been built by hand. They have also made sure that the fences are kept so that cattle can't stray.

In conclusion, all the care of the land has been done by a private owner. The Hackings have improved the water and kept the grazing under control. To let the Bureau of Land Management build a road through that land would be very wrong.

Sincerely,

Jennifer Hall

RESPONSE TO COMMENT LETTER 208 (HALL)

208-1 Please refer to our response 12-1.

208-2 Please refer to our response 53-1.

March 29, 1992
Marcia Borton
644 E. 300 S.
Vernal, Utah 84078

Team Leader Jean Sinclair
Bureau of Land Management
Vernal District
170 So. 500 E.
Vernal, Utah 84078

Dear Ms. Sinclair,

I would like to express my support for Alternative E of the Draft Diamond Mountain Resource Management Plan. Even though the plan goes a long ways toward providing necessary protection of the land there are some modifications I would like to see made. The Uintah Mountain Club is sending you a list of changes and I support this list of changes they want to see.

209-1 One change that especially needs to be made is an increase in acreage of Level 1 and 2 Management Priority areas. The amounts specified in Proposal E seem far too low. A reasonable

RESPONSE TO COMMENT LETTER 209 (BORTON)

209-1 Please refer to our response 61-1.

209-1 Cont. compromise between B and E is called for.

A special place of interest I would like to see protected is the Red Mountain Area north of Steinaker. This area deserves the maximum amount of protection possible. It should be restricted to nonmotorized travel only.

209-2 The beauty of the Red Mountain Area rivals that of most National Parks so we should ban the ORV's and take better care of it.

Another special interest of mine I would like to endorse is the reintroduction of bighorn sheep, black-footed ferrets, and river otters.

209-3

Overall, I think Alternative E is a good plan. If the BLM will make the changes proposed by the Uintah Mountain Club it can be even better and should do a good job meeting the needs of the many different users of the land.

Sincerely
Marcia Barton

209-2 Please refer to our response 79-2.

209-3 Thank you for your support.

1671 North 3996 West
Vernal, UT 84078
March 29, 1992

Jean Sinclear
Bureau of Land Management
Vernal District Office
170 S. 500 East

Dear Ms. Sinclear,

The Bureau of Land Management is trying to develop the Bear Hollow area and Manes Hole area on Diamond Mountain. While I believe that developing the different mountainous areas of our country is important, I also believe that the development of private land should be left to the owner of that land. I feel that the proposed developments of the aforementioned areas are wrong.

210-1 The proposed road would allow more people access to private land and this could prove hazardous to the surrounding vegetation as well as the cattle who live off that vegetation. The litter and pollution of the land will increase as more people gain access to it. A road will make it easier for people to travel through the vegetation and it will also increase temptation to travel off road, furthering the destruction of the precious grass necessary to sustain wildlife.

210-2 The proposed campsite in Bear Hollow will allow people to trespass on private land and possibly harm cattle and wildlife. Aside from that, I honestly don't think that anyone will use the campsite. The only time I ever see anyone camping up on Diamond Mountain is during hunting season and usually they stay in trailers.

I feel that the private owners of the Diamond Mountain land have used the land they own wisely, and that any interference in this care would be very wrong. Thank you for the time you have spent reading this letter and I hope you will take it into serious consideration.

Sincerely,

Amelia M. Hall

Amelia M. Hall

RESPONSE TO COMMENT LETTER 210 (HALL)

210-1 Please refer to our response 12-1.

210-2 Please refer to our response 53-1.

3-30-92

Diamond Mtn. Resource Manag. Plan.

Dear Sir:

Being a Diamond Mtn. land owner, I protest any resource management Plan. It will eventually interfere with Private land owners and I recommend leaving the situation as is.

211-1 I don't think its necessary to change the riparian area. Why can't Mother Nature be left as it is? As for wild life we don't need any more, we have enough to feed as it is.

A. Allen Bennion
726 N. 1500 West
Vernal, Utah 84078

RESPONSE TO COMMENT LETTER 211 (BENNION)

211-1 Thank you for your comments.

EXXON COMPANY, U.S.A.
POST OFFICE BOX 1600 • MIDLAND, TEXAS 79702-1600

PRODUCTION DEPARTMENT
SOUTHWESTERN DIVISION

ENVIRONMENTAL AND REGULATORY AFFAIRS

RICHARD D. GODDARD
SUPERVISOR

April 2, 1992

Ms. Jean Sinclair
RMP/EIS Team Leader
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Ms. Sinclair:

Exxon Company, USA appreciates this opportunity to offer comments on the Diamond Mountain Resource Area Draft Resource Management Plan (DRMP). Much of the Uinta Basin has been productive for oil and gas which has been beneficial to industry, the State of Utah and its citizens and the national economy. Although primary production has been in decline for many fields, much of the Uinta Basin continues to be of strong interest to companies with current producing operations and those interested in secondary recovery from existing fields and development of unconventional resources.

General Comment

Exxon is concerned about the selection of Alternative E as the Bureau of Land Management's (BLM) proposed management direction for the next fifteen years. Based on our experience as producers in the Uinta Basin, we believe industry has generally had a positive and productive relationship with BLM, land-owners and land-users throughout our exploration and production activities. Unfortunately, this productive relationship is not reflected in the DRMP and may indeed be challenged by the Bureau's plan to impose new restrictions on the oil and gas industry throughout the Diamond Mountain resource area.

212-1 If Alternative E is implemented as proposed, industry faces a 54% decrease in the amount of acreage available for leasing with standard stipulations, an increase of 152% in the use of seasonal or special stipulations and an increase of 160% in the use of no surface occupancy stipulations. The net effect of these changes to the oil and gas industry is less opportunity at greater expense for exploration and development of federal energy resources in the Diamond Mountain Resource Area. Because maps that identify where specific lease stipulations will be applied are unavailable, it is impossible to determine how Alternative E affects Exxon's current interests.

Justification for Proposed Change in Management Direction

212-2 In spite of the dramatic shift in management direction proposed by the DRMP, the Diamond Mountain DRMP does not identify any specific problems, justification or need which clearly supports the Bureau's plan to impose more restrictive management for the oil and gas program. Indeed, several statements are made to

RESPONSE TO COMMENT LETTER 212 (EXXON, COMPANY, U.S.A., Goddard)

212-1 The restrictions outlined in the draft document and the proposed restrictions provided in this document would apply to new leases only. The draft document clearly states that nothing in the RMP would preclude valid existing rights. The priority management area map for the various alternatives provided in the map packet of the draft document provide a general spatial depiction of the alternative levels of management. Please refer to the generalized oil and gas category map provided in Map Packet #8. At the time the final RMP and Record of Decision are approved, a detailed map will be provided defining the oil and gas leasing categories and associated new stipulations, if applicable.

212-2 Wildlife information in Chapter 3 has been changed to specifically identify problems and the need for more restrictive management. For example the special status raptor section has been expanded to document loss of habitat from human activity. Restrictions on surface disturbing activities have been reduced 1.5 months in the proposed plan on deer and elk crucial winter range. This is an example of less restrictions in the proposed plan as warranted by a re-evaluation of current knowledge. In addition, antelope habitat restriction periods are the same in the proposed plan as current management, but offer the area manager the use of mitigation to neutralize negative impacts. Please refer to Map Packet #8 for a graphic depiction of these restrictions. Refer to Chapter 1 for clarification on how RMP decisions would effect split estate and existing leases. A map depicting producing fields and ancillary facilities was deemed unnecessary. Again, refer to Map Packet #8. These generalized leasing categories will be finalized and depicted, both in graphic and tabular form, in the RMP's Record of Decision. Please refer to Chapter 2, Management Guidance Common the Proposed Plan and the Alternatives, under minerals, for a discussion of how restrictions would be addressed on split estate lands.

the contrary (Chapter 3, Affected Environment (page 3.11)) that, "General nesting and hunting habitat appear to be adequate.....for raptors"; "Elk are common and their numbers increasing in all herd units within DMRA", and "Mule deer and sage grouse occur throughout the resource area". Additional DRMP discussion notes, "Reintroductions in 1971 and 1983 have resulted in antelope numbers achieving Utah Division of Wildlife's desired management level."

212-2 Cont.

Exxon believes the Bureau should justify the need for change in the revised RMP. Maps identifying currently producing fields and ancillary facilities should be presented as well as maps which identify where standard, special and no surface occupancy lease stipulations will be applied. Because much of the federal acreage in the Uinta Basin is on split estate or held by production, discussion should be presented about how the Bureau will resolve conflicts arising from the Bureau's imposition of a more restrictive management scenario on private lands and in situations where leases predate the RMP.

Geophysical Operations

Aside from new leasing stipulations and prior rights, Exxon is also concerned about the RMP's proposals for geophysical operations and off-highway vehicle management. The discussion and intent for geophysical exploration management as presented in Table 2-13 (page 2.48) and Table 4-13 (page 4.67) are unclear and should be clarified. Both Tables appear to imply that operators can only conduct seismic programs on leased lands and only to the extent permitted by the lease stipulations. If this is the intent, the Bureau's assumptions are erroneous on two counts. First, it has been amply demonstrated by industry and BLM that geophysical operations are temporary and can be conducted with minimal or no on-the-ground imprint by utilizing a combination of data acquisition methods (conventional shothole, vibroseis, Poulter seismic and heli-portable drilling) and BLM conditions of approval which are tailored to local conditions and needs. Second, geophysical operations are routinely conducted (after BLM review and approval) on unleased lands or on leases held by other operators.

212-3

It is our view that geophysical activities are exempt from off-road vehicle restrictions. As such, Exxon is opposed to changes which would require conventional seismic operations to be confined to existing roads and trails and, would require all cross-country seismic to be conducted as heli-portable operations. All lands in the DMRA should be available for geophysical exploration.

Overstated Industry Impacts

We note references throughout the DRMP about impacts to resources and aesthetic values stemming from the oil and gas industry that appear to be somewhat biased. For example, discussion is presented on page 4.54 that industry activities degrade or compromise existing fish and wildlife habitats; similarly, discussion on page 4.57 states that oil and gas development on 150,900 acres would result in a drop of one recreation class. Conversely, the benefits accruing from the oil and gas industry are addressed only in the broadest terms without identification of actual figures for disturbed (or in-use) and reclaimed acreage and state revenues from production royalties, lease bonus and sales, severance or property taxes paid to the State of Utah.

212-4

212-3 An error in Table 4-18 of the draft has caused confusion between Table 2-13 and Table 4-18. Geophysical operations are discussed in Appendix 4. As discussed in this Appendix, geophysical operations "... may be conducted by bonded geophysical operators on BLM surface lands regardless of whether the mineral estate is leased or unleased,". Therefore, operators may conduct geophysical programs on both leased and unleased lands administered by the Bureau of Land Management. The wording of the proposed plan would allow geophysical activities to occur on level 3 and 4 lands with appropriate restrictions and on level 1 and 2 lands if determined to involve insignificant surface disturbance. OHV designations in this plan apply to casual OHV use. Permitted use, such as geophysical operations, can be allowed, provided the method used or resultant exploration would not cause significant surface disturbance.

212-4 The economic significance and importance of oil and gas resources to the Uintah Basin and to the State of Utah is stated on the oil and gas section of Chapter 3. The reasonable foreseeable oil and gas development and associated surface disturbance is listed in Appendix 4, Table A4-3. Further, Appendix 4 (Figure A4-1) and "Plugging and Abandonment Phase" discusses reclamation. The amount of oil and gas royalty and tax revenues which would be lost to the State of Utah and the federal government is analyzed and calculated for each alternative in Chapter 4.

The DRMP should be revised to eliminate the apparent bias and to include the specific information noted above. BLM should also draw attention to the fact that oil and gas projects are allowed to proceed only after BLM (and the public) reviews each proposal for impacts, identifies mitigation measures to be used if the project is approved, and attaches operating and reclamation requirements as conditions of approval.

Please do not hesitate to contact Mr. Fernando Blackgoat of my staff at the address noted above or by telephone at (915) 688-7560 if you have any questions or if we can provide additional information.

Sincerely,

Richard D. Goddard

c: A. Benitez, Rocky Mountain Oil and Gas Association
J. Peacock, Utah Petroleum Association
J. M. Parker, Utah State Office

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Sincerely,

Richard D. Goddard

c: A. Benitez, Rocky Mountain Oil and Gas Association
J. Peacock, Utah Petroleum Association
J. M. Parker, Utah State Office

April 1, 1998

Bureau of Land Management
170 South 500 East
Vernal UTAH 84078

RE: Comments on Diamond Mountain Resource Area

In general, I agree that Alternative E is the most balanced. I do however have areas of concern with Alternative E which are enumerated below.

214-1 1. Dry Fork/Red Mountain west of the Taylor Mountain road, and the Red Mountain areas need to be withdrawn from Mineral Leasing. The reasons include the damage of subsurface water aquifers by active mining. These aquifers supply the culinary water through water wells to Dry Fork residences. Mining would change winter forage for Deer and Elk as well as the resident deer forage. Much of the habitat on the Dry Fork hillsides is mature Juniper which lacks wildlife forage in the understory. This area needs to be strip chained or burned to provide varied vegetation. I would personally favor chaining with firewood being gathered and the remaining slash left to deteriorate and leach nutrients back into the soil without burning. The reaction of the area to the Archer Proposal would seem to make any of your Alternatives unacceptable as to Phosphate mining in this area.

214-2

214-3 2. The 10 mile buffer between reintroduced Big Horn Sheep and domestic grazing is excessive and should be 1-2 miles.

214-4 3. Bear baiting is not sport hunting and should be used only when excess bear numbers need to be reduced.

4. Cougar running should be restricted to a 5 day period per license. The lions should not be run for several days by dogs just to train the dogs during the middle of winter when most game is on near starvation diets. With current radio telemetry used to follow the dogs, this hardly constitutes sport.

214-5 5. More restriction of OHV to existing roads and trails with less destruction of ground cover and less interference to wildlife and small critters.

214-6 6. If Peregrine Falcons will nest in downtown Salt Lake City and other major metropolitan areas, the 1 mile restrictive nesting buffer is excessive and should be 1/4 to 1/2 mile at most.

RESPONSE TO COMMENT LETTER 214 (GARCIA)

214-1 Please refer to our response 112-1.

214-2 Two hundred acres of pinyon-juniper are proposed to be burned and seeded in the Dry Fork Allotment, refer to Appendix Table A8-4 for the proposed plan.

214-3 Please refer to our responses 116-8, 178-11 and 179-39 concerning the need for buffers between domestic and bighorn sheep.

214-4 Please refer to our responses 114-34 and 116-9. Regarding your comment on cougar running. The BLM manages wildlife habitat; UDWR manages the wildlife populations. Therefore your concerns should be referred to the Division of Wildlife Resources.

214-5 Please refer to Table 2-15, under OHV, as well as the interim management OHV map provided in the Map Packet #10. We believe this plan provides for the protection of critical resource values while allowing OHV use within the resource area.

214-6 The one-mile nesting buffer around peregrine falcon eyries has been recommended by the USF&WS and UDWR who have management and expertise on wildlife. In this matter we accept their recommendations.

214-7 7. Areas reserved for Black Footed Ferret reintroduction are excessive. To the best of my limited research, Black Footed Ferrets have never been demonstrated to have ever existed in Utah. The impacts to Oil/Gas Leasing and Uintah Basin economics are not justified by the INTRODUCTION of a new species to the area. The successes of the captive breeding program make the 1997 target date seem ambitious.

214-8 8. Less acerage needs to be withdrawn from Oil/Gas Leasing, especially in the Myton Bench/Pariette Bench areas.

214-9 9. More acerage for Tar Sands development needs to be available.

214-10 10. The special Deer hunts in Dry Fork on BLM Administered Ground, should be delayed until the Fawns can servive without their harvested mothers, unless the object is harvest both fawns and does.

Sincerely

James Garcia
13591 N Dry Fork Canyon
Vernal UTAH 84078

214-7 Please refer to our response 176-6 concerning changes to the acreages proposed for reintroduction of black-footed ferrets. The Uinta Basin has been documented as historical range by C.N. Hillman and T.W. Clare, 1980, in Mustela nigripes, published by the American Society of Mammalogists, Mammalian Species No. 126. Please refer to our response 205-5 concerning the success of the captive breeding program and ferret habitat management guidelines.

214-8 The level 1 lands within the proposed Pariette Wetlands ACEC would be withdrawn from mining activity. This is a relatively small, albeit important, part of the entire Myton Bench. If you are referring to the proposed restrictions affecting oil and gas, we believe such restrictions are necessary to protect the critical resources values identified for the bench.

214-9 We believe we have allowed the greatest flexibility regarding exploration and development of tar sands within the resource area, while protecting and/or maintaining important resource values.

214-10 Again, your concern would be more properly addressed by the UDWR, the agency responsible for wildlife population management.

Heather Campbell
9122 E. Highway 40
P.O. Box 69
Jensen, Utah 84035

March 31, 1992

Jean Nitschke-Sinclear, Team Leader
Diamond Mountain Resource Management Plan
Vernal District, Bureau of Land Management
Vernal, Utah 84078

Dear Jean,

I believe that Alternative E is the best alternative outlined in the Diamond Mountain RMP. Within that framework, there are several issues I would like you to address.

A positive step in land management is to address ecosystems as a whole rather than just address individual species within an area. Maintenance of diverse wildlife species and habitat is important to our area. The inclusion of the ACECs in Alternative E will help do that and I support their inclusion.

215-1 The Red Mountain ACEC does cause some conflict for OHV users in the area. The people using the area at the present time are a responsible group and would like to see the area remain open. As in so much in our lives, we are distrustful of future users, whether they be land managers or future OHV users who might be less responsible. If the option to close the area remains in the management plan, I would like to ask that you actively work with the current users in identifying problems and solutions so that closure will not be necessary. If a working discussion group is built into the plan, then future problems are less likely to arise.

215-2 Land ownership and access continues to present problems to private land owners in the area and I would like to encourage you to continue your efforts to consolidate land ownership patterns and avoid isolated tracts of public land where access must be through private land. In instances where that is unavoidable and causes problems for private landowners, fenced right-of-way corridors, while expensive, might reduce the impact on land owners and could avoid sensitive privately owned areas.

RESPONSE TO COMMENT LETTER 215 (CAMPBELL)

215-1 Please refer to our response 79-2.

215-2 Access to public land would be acquired from willing sellers or givers. Please refer to Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives for criteria involving land transactions.

A few quick comments about issues which are being addressed more fully in other letters:

215-3 I don't think we need as much designated black-footed ferret habitat as Alternative E includes.

215-4 I'd prefer no new phosphate mineral leasing along the south slope of the Uintas, particularly in the Dry Fork Canyon area.

215-5 Moonshine Arch deserves some special protection.

In general, I'd like to commend you on the document you've prepared. It is well written and more readable than other documents prepared by Federal agencies in the past. The best way to address all of the issues before us is to become as well educated about them as possible and to maintain an open dialog between the land administrators and the public users. While that process is often slow and frustrating, it is most important to involve as many of us as is possible. Thank you for the opportunity to participate in the process.

Sincerely,

Heather Campbell

Heather Campbell

215-3 Please refer to Table 2-15 for the proposed decision regarding black-footed ferrets. Under the proposed plan, only 1 site would be offered for reintroduction, thus reducing the acreage substantially.

215-4 Please refer to our response 112-1.

215-5 The road to Moonshine Arch has been closed under current management. Proposed management of the arch will be outlined in the coordinated activity plan for the proposed ACEC, if approved. A recreation-specific activity plan for the proposed Red Mountain recreation area also will be developed to outline specific management objectives and projects necessary to meet the recreational needs of the various recreation users, while enhancing or protecting the values that make this area so popular.

April 1, 1992

Penelope Smally, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Team;

I am writing concerning the Dimond Mountain Resouce Area Manaegment plan. I give my support to Alternative (A), realizing that C and D protects livestock grazing privileges much more than the other Alternatives. I also realize there must be a comprimise so I feel like plan A is the most reasonable. I would like to point out some discrepancys that may have influenced others to support plans B and E. I question the credibility of some of your resoursr material, namly; Norman Bangerter as an economist, and M.M. Kingon the Big Horn Sheep, I will talk about this later in the latter.

216-1 Page 4.60 "cumulative increased wildlife use from 27,600 aum's to 40,000 aum's could result in livestock reductions (9000 aum's) which may result in a $11,500 yearly loss to livestock industry. However this increase may also generate up to $94,800 for the local commuinty". Was this a screen to get people to vote for Alternative E? I feel this is not correct. Everyone give a choice would elect to loss $11,500 in order to make $95,800. The annual grazing fee would generate about 9000 X 1.92 = $17,280. Our operation last year generated about $86,000 using about 2126 active aum's of which 75% of our operation depends on these aum's. $86,00 X .75 = $64,500 The $64,500 is what 2126 aum's generated which all went into our local economy, and the sheep prices was depressed.So therefore it took the full amount to pay operating expences we was unable to pocket any of it. Cattle operations did much better due to high cattle prices. The 2126 aum's divided into 9000 equals 4.23. 4.23 X $64,500 = $272,835. The 9000 aum's would have generated $272,835 under the management of our operation. Seems that $272,835 of comfirmed procceeds is much better than $94,800 of projected earnings. I feel that an established industry is being sold out for the propects of a unknown spectulation.

Inconsistance page 4.46 states that a 500 aum increase would be worth $38,000 a year to livestock. Page 4.60 states 9000 aum's are worth $11,500 to the livestock industry there should be a constant value per aum when judging the impact on the Alternatives.

216-2 The problem I have with the reintroduction of the Black Fooed Ferret is that of the possibility of loss of grazing privileges, forced animal classes, forced "use periods" that do not fit into our operation. Loss of the power to control praire dogs on agreculture lands and Ferrets killing domestic foul. I do feel that the Praire dog does nees a natural predator and the Ferret may be enough to contorl them and no farther control may be needed.

I feel like our grazing rights a private privileges and in order to obtain them we must buy them or spend money time, blood, and tears in order to improve the range to the extent that it will carry more livestock, just to fine that

RESPONSE TO COMMENT LETTER 216 (HOLMES)

216-1 Please refer to our response 104-2.

216-2 Please refer to our responses 90-1, 176-5 and 205-5, concerning black-footed ferret habitat management. Also please refer to Appendix 2 for further management guidelines concerning ferrets.

much of our work has been to increase the number of wildlife and not the livestock.

I feel that the Fish and Game Department is standing here with their hands out. If they want aum's transfered to wildlife let them buy the base property and permits and transfer them to wildlife. While paying the annual taxes and grazing fees. After all these aum's are only valued at $9.19. I also disagree with this price. I have had to pay 4 times
216-3 that amount for some of the ones we own ada Nile W. and Evelyn Holmes Family Trust. It will take that much to buy them from us. In our case the Big Horn Sheep is threating our ability to maximize our profits and threating a change from the class of livestock that we feel best suits our Alotment. The DWR should compensate the permittee for the protent dollars loss as long as the restrictions are in force. this should all be negotiated on the free enterprise system,instead of the gradual taking a few aum's here and a few there which has been used in the past. We find livestock aum's have been cut and wildlife increase. We feel like we are paying the total price for increased wildlife. Let recreations pay their share. I feel like the DWR and recreationast wants the grazing privileges we have had to buy, but instead of buying them, they want them given to them. We are also finding restrictions placed on us, (threat of increased grazing fees, limited repairean use, spectified animal class, and others,) these restriction make so we cannot make any money. This almost seems like a plan with the hope that we will not be able to continue, thusgiving up our grazing privileges "the DWR could thenuse them and get them for nothing" nad then neverhave to pay an annual grazing fee or the taxes on the private lands. Let them use the money generated by recreational use, to buy thebase property and grazing alotments or negociate trades or make agreement with the permittee.Many would cooperate if they did not feel like they were being shafted.

All through this document I felt the importance of agriculture has been played down. I think we had better
216-4 remember who produces our food and what importants it plays in ourlives. Recreation is of no use or is not important to us ifwe are hungry or spending all our time trying to provide food for our familys. If we are short on money the first thing to go is the vacation.

To reduce jobs in rural Americs would increase unemployment and the homeless. That is what would happen if we use our public land for recreational use only. It would put more people in the cities competing for jobs which would lessen the wages there. With less money for vacations would our public lands be used for recreation as much as they are today. The recreation services will replace a percentage of loss jobs loss by stopping grazing, mining and timbering, but not the total amount and then it would be seasonal.

I would like to state a fact in econmices. When supply exceed demand prices are low, when demand exceed supply prices are high. I realize that a amall percentage of red mest is produced on public land. But is that small percentage large enough to create a "surplus or a shortage". I feel that everyone profits from grazing by cheaper food prices. Therefore

216-3 Under the proposed plan, livestock grazing preference is not reduced, but remains the same as current management. Wildlife forage allocations have been proposed to be increased in the same alternative and will be based on vegetation monitoring to insure that ample forage is available. Also please refer to our response 80-3.

216-4 Please refer to our response 3-24.

we have more to spend on recreation if the needed items cost less, more is spent on play. Will all resource set aside for recreation be utilied if we are spending all our paychecks on "nessissaties" food, clothing, housing, and transportation.

216-5 Recreation in our area has declined for the past 3 years. Wii Seep Ridge Road change that or will the liability cost more tha- the benifits?

216-6 Does the Fish and Game have the ability to manage our wildlife it increase our "recreational use". We have had a steady decline in the quality of Deer, Pheasants, Quail, Chuckers, and Rabbit hunting, and will until we address the predation problem, we have.

216-7 Could the pooer quality of hunting and less wildlife be the reason for three years steady decline of recreational visition?

I qusetion as to the extent of potental increase inthe "recreational use".

Do we become dependent on Foreign Nations to produce our food, like we did in the 70's and still are dependant on imported petoreulm. Is there any need to be dependant on others when we have a renewable resoursr "RAnge Lands". All we need is the wisdom to harvest it. I feel that by utilizing the multiple use concept we can hunt,and observe wildlife, view fossils and formations, enjoy float trips and fish and also have a surplus of food that as Americans we have came to expect.

Thank you;

Holmes Bar-NE Ranch
By
Dwayne W. Holmes

Dwayne W Holmes

216-5 The economic impacts of the proposed Seep Ridge Road, also referred to as the Ouray to I-70 highway, are addressed in the forthcoming environmental impact statement. While this proposed highway would cross Diamond Mountain Resource Area, none of it would be across public lands administered by BLM. Please contact the BLM Moab District to have your name added to the mailing list.

216-6 We agree that the quality of habitat has suffered recently, mostly from continued drought in the Uinta Basin. Our information indicates that the recreational visitation has not declined, but rather the success during the hunt has decreased. We continue to propose and complete range improvement projects to improve habitat, but this would never compensate for ample precipitation throughout the year. Please refer to our response 12-2. In our ADC program, we have allowed for predator control where we feel it is necessary and justified.

216-7 Our prediction of future recreation use is based on increases we have experienced over the past several years. We have no reason to believe this trend will not continue. We use visitor counts, traffic counter data, and information from other governmental agencies in making these predictions.

TO: Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

FROM: Ralph Siddoway, land owner and Ashley Valley Farmer

RE: Diamond Mountain RMP

From my point of view as a Rancher and Farmer ~~that~~ there are some short comings in it that I would like to call attention to. Not that I would take anything from this plan, because it is excellent and real scholars have prepared it, but I would like to put my point of view into try and point some of the short comings of the plan if I can from my point of view.

While the experts have been preparing this for two or three years, I have only had a chance to spend a very limited amount of time on it. There are many things I will not even touch upon, but just a few things that I would like the attention to the Bureau of Land Management where I think the plan could be improved.

Briefly this plan includes 3,777,000 acres of land which is comprised of property which is administered to by the Ashley National Forest, the State of Utah, Bureau of Land Management, Duchesne County, Uintah County, Flaming Gorge National Recreation Area, Dinosaur National Monument and many private land owners, so we do have a problem of vested interests. Even the Indians were includes in this. The Uintah Ouray Indian Reservation is part of this plan. It needs be given consideration from many points of view. And it is with this in mind that I am going to try to give a point of view of at least of some of the Ranchers and Farmers.

217-1 It should be noted that 29% of the land included in this plan is privately owned land and any thing that is done by the Bureau of Land Management to change the present administration will effect most of these private land owners who are Farmers and Ranchers so we need to respect their rights also. Also many of these Ranchers are permitees on the Ashley National Forest so they will be affected from that point of view also. Then they are also lessors of state land and will be affected again for anything that this plan attempts to change from the degree

RESPONSE TO COMMENT LETTER 217 (SIDDOWAY)

217-1 Please refer to our response 52-1.

217-1 Cont. of the administration of the state lands in relation to the Bureau of Land Management Plans, so it will require a lot of giving and taking if this plan is to work.

Quite a lot of this plan has reference to wild life and live stock, which rightfully it should and that is a big part of what this whole area is all about. If fact, the whole Taylor Grazing Act in which we get all the authority to operative this land from states very clearly. The purpose of the Taylor Grazing Act is to stabilize the live stock industry. With that in mind I think we should look at the various changes which are recommended by this plan to see if the really do stabilize the live stock industry. Of course there other purposes it has also, but from the Rancher and Farmer point of view the big majority of the public domain was used and still is used for grazing purposes and it should be used where it will benefit the live stock industry. The issues here involves many conflicting demands for consumptive and non-consumptive pieces of vegetation, the soil, the water, the water sheds, the timber, and graze land grazing so it needs to be approached with a view in mind that everybody can get something good out of this plan.

217-2

When we are talking about use of this land for grazing we should recognize that not only the vegetation is important but the water is important, and the water shed is important and much of the available water for use by live stock and wild life also is on private land and when you increase or decrease livestock or wild animals either one it will effect the burden that is put on the private land and so if you increase by a large of wild animals that you put on the Bureau of Land Management Land it automatically increases the amount animals that will be on private land. And whether this is just or not somebody needs to determine because if you 1/3 more Elk on the Diamond resources than it presently has then we are going to many problems. The first problem is that in the view of many people there is not enough vegetation to carry this large number of Elk on the Diamond Mountain area without injury to the live stock industry and without injury to the deer population in fact the deer population has been hurt right now because they are in competition with the Elk. The Elk has increased real rapidly within the last few years, but you have noticed the deer have decreased, so you have got a problem there and we need to recognize that if you are going to increase the amount of elk by 1/3 then your automatically going to decrease the number of deer that are available and you are going to put quite a severe burden on the private land because even thought you may develop excess feed on Bureau of Land Management Land, nobody is going heard Elk. Those Elk will go where they want to go, and when they get thirsty they will go on private land, and if there is some

217-2 Impacts to private lands from possible increased wildlife use have been discussed under the cumulative impacts of the proposed plan and Alternative B in Chapter 4. Please refer to our response 12-2.

particular variety of feed on private land that they like they are going to get it. We saw that on the rim of Diamond Mountain in 1991, in the fall of 1990, and the winter of 1991 where on the rim of Diamond Mountain and a lot of money spent changing that surface from grazing to farm land. The deer have noticed that change and they have moved over there, but that wasn't nearly such a burden as when the Elk moved over there. These Elk are large powerful animals and you can't fence them out with an ordinary fence. It was real devastating to this new farm on Diamond Mountain when the Elk took over. Attempts were made to fence them out but they were not successful. It take a different kind of fence to control Elk than the farmers are used to is this area, and so it was a real hardship on this farming enterprise on the rim of Diamond Mountain and will continue to be a hardship on Diamond Mountain as it is developed into farming area. That should be recognizes to begin with that Elk are detrimental to farming and they are really difficult to control. In addition to that the Elk appears to have about as many animals on the area that we are speaking of as it can possibly control. In the winter of 1990 in January, February and March we saw the Elk invade the highways in Ashley Valley. Now for a long we have had deer on the state highways and they are a problem, but they are not near as severe a problem as the Elk are on the highway. The Elk are large and if you run into one of those Elk you just about demolish the car, but severely injure the passengers in the car much worse than the deer will do. And we did have on highways between Vernal and Jensen Elk on the highways that were a real problem, and that needs to be considered. And then when spring came these Elk stayed down in the Jensen and they didn't move back on the mountain area, so you have an invasion there. Where we have never had Elk before they have them. In fact when the elk first planted in the Vernal area sometime 1950 when they were planted here there was always heard of elk at Greendale that are native there, but there is not very many. There is not enough to hunt. So when the area was restocked by the Utah Division of Wildlife Resources it was done with the approval of the Forest Service, Bureau of Land Management, and the private land owners, they all agreed to this but they also agreed that the heard would not be over 150 head. It many, many times that now and it has caused a problem and we need to recognize that before definitely increase that heard a lot. In the first place there is not room for that many elk in this area without conflicting serious injury on the highways, on the farmers and ranchers, on the deer population and those people who like to hunt deer. It should be recognized that that is one of the problems that has to be solved and since is responsible for seeing that the elk stay where they should stay then the problem usually becomes the problem of the

private land owner, like it did on Diamond Mountain in 1990. That problem needs to be solved or most likely the elk will not thrive there and be a problem to the land owner and the elk population until something is done to solve it. It will take more than just to solve this problem. It is a new problem for us and it will take a lot of ingenuity to keep these elk off the farming ground. If there not kept off the farming ground these elk can not prosper and neither can the farmers. It will a bad situation for both.

Now in the plan on page A8.19 it states that the existing livestock preferences exceed the current production of vegetation. That is not a very long statement but it contains a world of thought and must go into the regulation of wild animals before they are increased. There is even enough feed there to take of the livestock that are permitted there, and now if you come along and increase the number of wild animals, which will take even more feed, then you have infringed upon the private land owner again and that is just not right thing to do.

Of course the plan says that there will be planning, administration, there will be more feed produced on the BLM land, more water will become available, that is fine it should be, but that should be done first before the elk population is increased. Don't increase the elk and then try and increase the vegetation and the water resources. It just doesn't work that way. Have these resources available before you increase the elk and then if you are successful in increasing the elk there will be a hold for them to go to. If you do it the other way, increase the elk and then encroach more upon private land owners water and vegetation there is going to be trouble.

On page 1.6 there is a very significant statement on this plan. It states "Management concerns, issues and problems are discussed with the RMP. When existing or proposed management of one resource significantly contains or curtails existing or proposed use of another resource." That is certainly true. If you increase the number of elk for constraining or controlling the amount of use the private land owner can get from his own land and his own water. That needs to be taken care of. The agency does like to guide and require the land use allocations not now in place to be made through the planning process. But lets make those available before you increase the elk.

Sometimes the existing land use is already in conflict with the elk and the farms, and the elk and the cattle, and the elk and the sheep, because stated previously this plan already recognized there is a shortage of vegetation and when you have a shortage of vegetation for the live stock

that is permitted there then you come and increase the amount of elk that are allowed to go on that, also you are just making a bigger problem than you have already got. If you are going to maintain a profitable and thriving grazing community for the livestock industry in this unit we must be aware of these problems. We must not cut down on the amount of water and feed the private land owner has developed for his own use and give it to the wild animals. In many cases the only place that the deer and the elk can water is on private land. Now that may be a hardship on the private land owners. And off of this, if you put another burden on them then it is going to make a real serious problem and it is not going to contribute to sustaining the livestock industry. If we are going to sustain the live stock industry lets look out for them while we put this plan into effect.

As the plan states on page 137. To the extent possible coordinate land use inventory, planning and management of public lands with the land use planning and management programs of other federal agencies, and the state and local government use. This must be done. While the plan provides for it, lets not over the plan. Lets not make it more difficult to graze this feed for the livestock industry as it already is, and not take any more of the ranchers water than we already do.

217-3 This plan does not address the wilderness designation that has been taken effect for the last ten years, which has been an encroachment upon private industry and private grazing. We shouldn't give them an added burden from this plan that will increase the burden that the wilderness area has already put on them. The livestock grazing has already lost 3800 animal units feed, since they were first permitted. That is quite a severe loss, and when you look at the other losses that are contemplated the other wilderness areas or other parks and withdrawal, and the other recreational demands that are made upon this land, the grazing area should not be reduced further than it already has been.

If the elk herds are increased by thirty or forty percent, who carries the burden of this?

1. The privately owned land owners, farmers and ranchers.
2. The United States Forest permitees who are licensed to feed on the forest.
3. BLM private allotment owners who are allowed feed and water on the BLM land.
4. The state land part of which are leased by private lessors will loose also.

217-3 General planning criteria, outlined in Chapter 1, directs wilderness designations already analyzed in the existing Colorado and Utah Wilderness EISs (completed in 1990) will not be addressed further. Impacts from designation or not as they affect the livestock industry are analyzed in detail in these statements. During the public scoping period at the beginning of this project, no new areas were identified for consideration as WSAs.

These unreasonable proposed increases in wildlife will further burden the poor classes of people and the general public. By a decrease in the economic value to the general public which will be lost to them. And who will receive the benefits from this increase of elk herds, largely hunters from out of state. While the increase the revenues to the wildlife resource of the state of Utah it will not nearly compensate for the burden caused the private ownership of land owners and the grazing permitees of Utah and the decrease of economic value to the general public.

For the introduction of Rocky Mountain Big Horn Sheep. It also calls for a ten mile buffer zone around the introduction sight from domestic sheep. The twelve mile buffer zone was not documented from any literature but just stated by someone that was on the committee to write it. It seems to me that this is an awful big buffer zone. Wider that most allotments on the BLM. It is about the same distance the city dump to Brush Creek. What will happen to the butter zone? Will that just be an increase in the amount of land that is allotted to the wild sheep or will the domestic livestock be allowed to trespass on thar at will. Will it be fenced, or how will it be maintained as two buffer zones so that neither class of stock intringe upon the other. It seems rather out of range procedure to me to set aside such a large buffer zone as this. It may be that there should be a buffer zone, because we know that Big Horn Sheep carry disease which is transmitted to domestic sheep. It is quite possible that domestic sheep carry a disease that can transmitted to the wild sheep. So it may possible that we need a buffer zone. But from all the evidence that is at hand immediately I think that including the ten mile buffer zone between the two is ridiculous.

217-4

Included the Diamond Mountain Resource Area Management Plan there is some evidence that domestic sheep have infected wild sheep with disease. But there is also more evidence not included the resource plan that the wild sheep have infected domestic sheep. It seems to me that wild sheep are going to infect domestic sheep. They should not be put on the range where domestic sheep can come in contact with them. The domestic sheep should not have the burden of leaving ten miles of vacant space between the sheep allotment and the wild sheep allotment. Something should be done to alleviate this. If fact, in the Salt Lake Tribune just recently there was an article where 100 Bureau of Land Management, U.S. Forest Officials and Utah Natural Resource Officials were using airplane and helicopters to scan the area that they could to determine if there was any poison scattered on range, and finding all the dead animals that they could and tried to detect if they had been baited for poison which would kill coyotes. If it is illegal to

217-4 Please refer to our responses 110-10 and 116-8. Please also refer to the discussion in Chapter 3 which documents the need for a buffer between domestic and bighorn sheep. The buffer zones would not be fenced and we would anticipate domestic sheep would be herded away from the zone, much like they are around adjoining grazing allotments. The allotments cited in Appendix 8 as exceeding current preference are few in number and are currently being resolved through agreements with the involved grazing permittees. Some allotments may need further monitoring before any adjustments are made.

poison coyotes it certainly should be illegal to poison domestic sheep. If wild sheep can be proved to carry disease to the domestic sheep then they should be excluded from the range just the same as poison should be excluded from being baited upon the open range so should wild animals be excluded from scattering their disease.

When the Taylor Grazing Act was passed in 1934, grazing allotments were organized and a significant decrease in the number of livestock the was permitted to run on the range was made. Many people were put out of business at this time. To make room for the livestock to graze the grazers that was there. It simply would not carry all the livestock that were being put on the grazing land and so there was a significant amount of sheep excluded and also cattle from running on the open range. At this time they also set up what they determined to be a fair share for the wild animals. They were given what was to be their fair share. Since that time there as been many times where this has been changed, and every time that I know of, where there has been an adjustment made the livestock have been decreased to make way for increase in the wild animals. This does not appear to me to be the way to solve a problem justly, maybe sometimes should be. I think this has been carried to an extreme and the livestock animals have been decreased to make way an increase in the wild animals more than the fair share of the time.

On page A8.17 of this plan, it has given a fair description of what has happened. It states how the livestock industry has been decreased and it has according to this report has been decreased 9%, and the wild animals have increased 25%. I am including this sheet just as it is printed in the resource area plan as part of my comment because it is significant to show that the domestic livestock have been imposed upon in my opinion to the advantage of the wild animals.

217-5 Also in this plan where it discussed the economic importance of the livestock industry in Uintah County. It seems to indicate that the livestock industry is an insignificant affair. It doesn't really amount to anything, and that what is really important is the wild animals in the county.
I think this is erroneous and can not be substantiated by the facts, and we have some proof of this. Mr. Cheeny who was manager of the Uintah State Bank during the years 1940, 1950, and 1960 made a statement in 1950 is really significant. The Uintah State Bank at that time was the leading bank in the Uintah and Duchesne Counties. During the years of 1940 and 1950 the Uintah State Bank had deposits of more than all the other banks put together. And he made a statement that his own record that 3/4 of all

217-5 Please refer to our response 69-2.

the money they took in at the Uintah State Bank came either directly or indirectly from the livestock industry. It is true that that is not the case today, and it can't be the case as long as you keep pulling the livestock industry and adding the wild animal industry to the grazing area. But at that time it was a significant part the Uintah County. And it is today. It is reported that of the three counties that have grazing allotments in this area, that theses allotments contribute $54 million dollars to the wealth of these three counties. Which seems like a significant amount of money for the Diamond Mountain Resource Area to contribute to the agriculture of these three counties. Most of the money derived from agriculture in the basin is do to livestock. Most of which is spent here in the basin.

217-5 Cont.

There is another significant part to this livestock contributing to the Uintah Basin and that is all the reservoirs and all the canal systems and all the irrigation systems that cost millions of dollars to install and to operate are dependant for the success of farming industries of livestock in the basin. True, some of the farm products can be exported but being 120 miles from the nearest railroad. It is impractical to try and export such crops as hay and grain. You just can't export hay and grain and compete with the outside world, so you have to feed it to the livestock that is here. That is what this livestock and farm industry have been based upon for the last almost 100 years. The farmers ~~sales~~ sell their hay and grain to the livestock people. The livestock people have been able to buy hay and grain produced here locally so they didn't have to import it. It is quite a unique operation, but when you disturb that and take the livestock off of this area, you are not only taking the livestock income away, but you are also taking the farm income to a great extent away from this place. It is not profitable to produce hay and grain in this area and export it. It cannot be done. But if it can be used to feed the livestock in this area where it compliments the livestock business, the livestock business compliments the farming business. This is a unique operation and has been for a hundred years and should still be that kind of an operation. It is profitable and contributes a lot to the economics of the whole area.

I would like to conclude my remarks about the resource management plan with this idea in mind. That the farmers, the merchants, the bankers, the county, the state and federal are all in this together. And if you can keep this working so that the livestock industry can be a prosperous industry it supplement the income from the farms, and the farms will supplement the income form the livestock industry and make this a productive unit as it has been in the past. And that is the way is should be operated. Not exclude the livestock. If they have to exclude the livestock to permit wild animals it just won't work.

Ralph Siddoway

March 30, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

Dear Penelope Smalley, Team Leader;

I am amazed at the time and effort put into the making of the Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement and shocked at the cost of such a thing. I feel there are some things that need to be relooked at, clarified, or included in the document. I'll list some of them and hope you will take note.

218-1 As Co-chairman of the Uinta Basin Riparian Coalition, I and the other members discussed the document in our last meeting. The members felt the approach to riparian areas was fairly proper but lacking in some areas, such as no specific mention to water rights, nor that managing riparian zones would have to consider the impacts on private property as well as federal range. Water rights need to be recognized since if the right has to do with irrigation, riparian restoration could have an impact on water delivery. The members of the coalition brought up the fact that all grazing impacts need to be addressed, to include wildlife, not just livestock; especially since Diamond Mountain neighbors the Ashley National Forest and they've seen some overgrazing by elk on streams.

218-2 Talking about grazing, on page 1.11 where wild horses are addressed, instead of saying, "Wild horses will not be addressed further in this plan.", the plan should read more like feral horses will be subject to the Wild Horse and Burro Act and will be removed at owners cost or sold to retain cost of removal.

218-3 To make a statement as found on page 4.23, "The livestock grazing industry in the Uintah Basin has insignificant economic impacts nationally.", is in my opinion not very proper. Since we are talking about Diamond Mountain, why not state Diamond Mountain resource area has no significance nationally. To use a figure such as $9.19 as the cost of forage/AUM, and then say that it is the value brought into the local economy is an error in the use of the value of the forage since forage value and local economic value are not the same thing. On page 3.53 it's stated "Presently an AUM is valued at $9.19 as determined by the Agriculture Statistic Service, USDA (1991)." I coulon't find mention to that figure anywhere in the Agricultural Statistic book and I looked cover to cover. I feel that using an assumed value on wildlife and recreation is improper when this document will have a 15 to 20 year impact on the area.

RESPONSE TO COMMENT LETTER 218 (CHEW)

218-1 In Chapter 1 it states that valid existing rights take precedence over any management decisions depicted on the alternative maps. Water rights are considered "valid existing rights". Activity level projects will comply with NEPA procedures of which impacts to private property will be considered. In reference to wildlife use on riparian areas, please refer to our response 116-2. Significant impacts to riparian in the proposed plan are not expected, however, as part of Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives, under vegetation resources, it states: "Temporary adjustments in use due to effects of drought would be made to livestock and wildlife as shown needed by monitoring."

218-2 Again, please refer to Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives regarding management of wild horses within the resources area.

218-3 Please refer to our response 104-2.

218-4 Contrary to alternative B, I feel that bear baiting by permit is a proper activity to allow, as long as it is within DWR rules.

218-5 There are a lot of noxious weeds in the DMRA especially along stream corridors. I did not see anything in the document that addressed this problem. If some of the streams go to a wild and scenic status, would this limit chances to control the noxious weeds? Proper chemical treatment should be allowed in all forms of vegetation control.

218-6 I am concerned about some of the criteria talked about for the reintroduction of bighorn sheep. In everything I've ever read I've never seen anywhere that it is suggested there should be a 10 mile radius from domestic sheep. Recently there have been studies that show bighorns already possess the diseases that are of a concern of them acquiring from domestic sheep. History tells us that not very long ago people felt that domestic sheep were detrimental to cattle, and now everyone knows that common use of the range is beneficial for all animals.

Sincerely,

Scott H. Chew

Scott H. Chew

218-4 Please refer to our responses 114-34 and 116-9.

218-5 The proposed plan provides a management decision for noxious weed; it is outlined in Table 2-15. The specific management prescriptions for weed control along the upper and lower segments of the Green River are also outlined in Chapter 2.

218-6 Please refer to our responses 116-8, 178-11 and 179-39 and new data added to Chapter 3 which should explain the need and justification for the buffer between domestic and bighorn sheep.

Vernal, Utah
April 29, 1992

Penelope Smalley
Bureau of Land Management
Vernal District
170 South, 500 East
Vernal, Utah 84078

Dear Ms. Smalley

This is my response to the Diamond Mountain RMP.

I realize the scope of the Draft document is considerable and that there are many concerns and uses affected by this plan.

219-1 My main concern is that it appears to me that no one with a true agricultural background assisted or had final say in the preparation of the Draft document. Several places the document refers to agriculture and particularly livestock as a minor industry in the Uintah Basin. The tone of the document is that Wildlife and Recreation have first priority on BLM lands. The 1991 Utah Agricultural Statistics points out that the cash receipts of livestock in the three county area of the Uintah Basin is 54 million dollars. Certainly that is a significant amount. Livestock represents the most basic and probably the most stable industry we have in the Uintah Basin.

RESPONSE TO COMMENT LETTER 219 (TAYLOR)

219-1 Please refer to our response 104-2.

-2-

219-1 Cont. Further livestock create new wealth to the economy each year, as opposed to wildlife and tourism competing for dollars that if not spent in the Uinta Basin will be spent some where else.

On pages 1.5, 1.9, 2.7, 3.5, 4.26, 4.27 statements are made that imply livestock and wildlife are not compatible. I feel that in most instances livestock and wildlife, if properly managed, can complement each other.

I use and am most familiar with the Red Mountain and Spring Creek allotments. I see and count the wildlife on these allotments quite frequently. In referring to Tables A2-1 on page A 2.6 I feel that the wildlife AUM numbers are much closer to the objective numbers than what is shown as current numbers. The treatments for increasing AUM's should be accomplished before any increase in wildlife or livestock are permitted. Management of wildlife during March, April and May, when they are most detrimental to the range should be a concern. Objective wildlife stocking levels for this unit includes 10 Moose AUM's. We have seen moose in this allotment but they always move out in just a day or two indicating they don't want to stay in this area.

219-2 Current and objective AUM levels noted in Appendix 2 were derived from UDWR herd unit estimates and broken out by allotment by BLM. These estimates are for use on BLM-administered land only, and do not account for wildlife use on state, other federal, or private lands. We recognize wildlife do not follow administrative boundary lines and that wildlife use depends on availability of forage and physical and terrain factors. This may account for the differences in numbers you have observed. Our concerns not limited to spring wildlife use, but their long term, year 'round patterns. This accounts for the proposed decision stating objective levels would be achieved only if monitoring indicated adequate forage was available and the vegetation was not being harmed. The allocation of forage for moose is to account for the occasional moose that use the allotment as you indicated.

- 3 -

219-2 Cont. If they were to locate ~~here~~ on this allotment I think they would congregate at Stewart Lake which would probably create a problem there.

The same generalization could be made for the Spring Creek allotment. This allotment

219-3 has an objective use for 50 AUM for Big Horn sheep. I feel this allotment is too small for Bighorn ~~without~~ because of human harassment by recreation vehicles and herding of cattle.

I appreciate this opportunity to contribute and hope these views can be considered in the final draft.

Sincerely Yours

Kyle Taylor
2271 N 1500 W
Vernal, Utah 84078

219-3 The allocation of forage for bighorn sheep in the Spring Creek Allotment would be for the Ashley Creek Gorge area. This potential habitat area would connect across the face of Dry Fork Mountain to Dry Fork Canyon and onto the adjacent Ashley National Forest area. We identified this area due to documentation as historical habitat. We recognize the problems you mentioned involving private land in the area. Due to these reasons, the Dry Fork area would probably be the lowest priority on our list for reintroduction efforts.

MARCH 31, 1992

PENELOPE SMALLEY, TEAM LEADER
BUREAU OF LAND MANAGEMENT
VERNAL DISTRICT
170 S 500 E.
VERNAL, UTAH 84078

PREPARERS:

CURRENT MANAGEMENT PLAN A FOR MANAGING PUBLIC LANDS IN THE DIAMOND MOUNTAIN RESOURCE AREA SHOULD CONTINUE. MULTI-USE CONCEPTS WITH RANGELAND MANAGEMENT TO MAINTAIN OR IMPROVE CONDITIONS MUST BE INCORPORATED BUT NOT LEANING TOWARD A ONE USE OR FIRST USE CONCEPT.

220-1 IF LIVESTOCK GRAZING MUST BE LIMITED AROUND BIG HORN SHEEP HABITAT IT SHOULD BE DONE WITH ALTERNATIVE GRAZING PLANS. BECAUSE OF THE SERIOUS EFFECT RELOCATION OF BIG HORN SHEEP COULD HAVE ON LOCAL SHEEP PRODUCERS MUCH MORE RESEARCH IS NEEDED BEFORE SUCH A LIMITATION ON GRAZING CAN BE JUSTIFIED. SOME LOCAL RANCHERS COULD BE FORCED OUT OF A LIFESTYLE THAT HAS EXISTED FOR FOUR GENERATIONS.

THERE MUST BE RANGELANDS, WILDLIFE, RECREATION, TIMBER SCENIC USE AND WITH A UNITED COOPERATIVE EFFORT OUR PUBLIC LANDS COULD BE MANAGED, PROTECTED AND IMPROVED WITH MULTI-USE PRACTICES FOR THE GENERATIONS TO COME.

SINCERELY

Ernest J. and Linda G. Holmes

RESPONSE TO COMMENT LETTER 220 (HOLMES)

220-1 Please refer to our response 178-11.

March 30, 1992

To Bureau of Land Management
Re Diamond Mt Resource Management Plan Draft

You deserve a lot of credit in your completion of the draft Diamond Mt Resource Management Plan. Completing a plan of this scope with the various issues and interests is not an easy task. You have also done a comendable job with public involvement. The recognition of the ACEC designation for Dry Fork-Red Mountain Complex is a result of this process. Your recognition of this critical area to the basin and the philosophy of critical
221-1 resource values that give ACEC [redacted] recognitation is well developed. You state the value of this area to the future of the basin through recreation and other values that give the area ACEC designation cannot be over emphasized. Yet at the same time you make the assumption that leasing and development of phosphate is compatible and it is not. The integrity of the ACEC designation and identified values cannot be maintained with mineral leasing of phosphate. Phosphate development is incompatible with the special emphasis programs of recreation, wildlife and watershed being pursued by federal, state and local agencies. It is also incompatible with traditional uses of the land such as livestock grazing and water uses. As additional housing development take place in the Brush Creek and Spring Creek Area, as well as upper & lower Dry Fork, phosphate development become a threat to residents in the quality of life of those people directly affected by proximity and the basin as a whole as traditional uses of the area are determinated. In recognizing the best use of the land for the basin through ACEC designation, phosphate development is incompatible. The benefits to be gained by phosphate leasing & development are far outweighed by the quality of life the basin will experience by managing for those resources that give the area ACEC status. Your preferred alternative needs to withdraw phosphate leasing in these lands

RESPONSE TO COMMENT LETTER 221 (JOHNSON)

221-1 Please refer to our response 112-1.

designated as the Dry Fork Red Mt ACEC complex.

221-1 Cont.

The consequences of phosphate development to the identified resource values of the ACEC were not adequately addressed. In withdrawing these lands, as needs to be done in the preferred alternative, the reasons should be clearly spelled out. These reasons are all contained in the ACEC nomination.

221-2

One of the most critical reasons to the west of 191 is the Vernal Municipal watershed and the springs the supply water to the valley. The critical condition of the underground caverns system should be addressed in Affected Environment. Numerous publications exist on dye testing to show the underground water flows both east and west of Ashley Gorge. Any activity that would cause a failure in this system would threaten the municipal water supply. On two occassions last winter, blasting at Chevron shook homes in Dry Fork. What level of blasting and how far west could cause changes in spring sources & possibly alter the entire underground water flow? Impacts to Watershed, residents, recreation, wildlife, Cultural Resources, ranching & the future of the basin are incompatible with phosphate development. The Red Fleet area portion of the ACEC east of 191, is receiving increase yearly and provides a scenic backdrop to the basin. The whole of the ACEC, rightly recognized needs to have a withdrawal from phosphate leasing as part of the Mgmt plan for the area. There are some vague & inconsistant coverages of phosphate. Part of the plan talks about strip mining & overburden, part of it underground room & pillar mining. Sections have the whole area open under class 3 lands p. 4, 8 says mining activities would be confined to lands east of Brush Creek?

221-2 Please refer to our response 61-2.

221-2 Cont. The desire to work with the public on developing a plan for this area is an exciting and great opportunity. But in order for a meaningful plan to be developed clear direction for the area needs to be given & this involves the withdrawal of phosphate leases. Underground mining is unacceptable west of 191. This would not eliminate the threat to the underground water system.

221-3 A few other Concerns with the preferred alternative:

Livestock Grazing: the ACEC nomination for the area recognized the value of livestock grazing & the need to continue this activity. Much of the rural makeup of the Uintah Basin is based on the ranching industry & this industry has been a stable economic force in the area. A higher priority needs to be given to the ranching industry and proper grazing levels the ranching community should not be hit with a reduction of AUM's. your document addresses the problems the ranching community is experiencing and to reduce AUM's would only add to the problem. Many ranches are incorporating recreation use in their operation such as Cattle drives etc. Continued traditional ranching & modified recreation ranching are both a use that needs recognition It would not be in line with the reasons for ACEC designation to favor increased wildlife numbers & recreation use at the expense of compatible traditional uses

221-4 Also p 4.65 - Under the preferred Alternative No additional public access should be acquired. This would create impacts unacceptable to the other resource values. No new access should be acquired

221-3 No reductions in livestock are proposed for the Red Mountain-Dry Fork area. Vegetation monitoring on the grazing allotments would be the basis for any future reductions.

221-4 Public access to public lands presently surrounded by private lands was identified as an issue during the scoping period. Public access would be acquired only from willing sellers or givers.

A very important recognition you gave to the 1978 American Indian religious Freedom Act and associated recognition in ACEC's to traditional Ute usage of the land really needs to be commended. This is the first planning document I have seen recognize not only the act but also the incorporation into the document. This is a highly commendable recognition.

The Native American heritage is very much a part of our culture.

The western ranching heritage is also very much a part of our culture and needs to be recognized not only from the economic standpoint of the basin & individual ranchers but also it cultural significance. For every recreationist that is appaled at seeing ~~[illegible]~~ livestock grazing on public lands, there are many more that share a certain excitement in seeing these same animals.

221-5 I would also like to discourage the use of fencing riparian areas and instead look at other management options to improve riparian areas.

In conclusion you need to go back to the original ACEC Nomination for the Dry Fork Red Wt complex and to develop the management direction with the emphasis on compatible resource values and

The plan also needs to allow for additional restrictions if it becomes

221-6 necessary to protect resource values at risk i.e. additional closures for ORV's and other recreation use restrictions to protect riparian values etc. ~~[illegible]~~ Encourage timing changes etc and other mgmt options to ranchers to reduce predator losses rather than current predator control methods. There are many opportunities for compatible uses to be worked out that have just short extensions of disagreements. The plan for Dry Fork Red Wt ACEC can provide a great opportunity.

Thanks Darlene Johnson

221-5 Fencing of riparian areas is identified as only one management option to maintain and enhance riparian values.

221-6 We believe the management prescriptions for the Red Mountain-Dry Fork ACEC provide for the protection of important resource values; while allowing for reasonable development or use of compatible resources.

George R. Miller
2510 W. 1000 S.
Vernal, Utah 84078

March 27, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley,

222-1 As Diamond Mountain landowners of some 700 hundred acres which is used for summer grazing and recreation, we can't see the need to start opening up more roads. If anything, the existing ones need more work and maintainence.

Your draft is so complex and hard to read and understand it is difficult to form a good opinion in 90 days on what took a qroup of people and three years to prepare.

We would if anything have to favor Alternative A, at the same time we see no reason not to continue on the same level as in the past. We thought you were doing the job well enough as it was. We also hope that a few radical environmentalist qroups are not trying to change your past policies and in doing so creating problems for the silent majority.

Sincerely,

George R. Miller
Maxine Miller

George R. and Maxine Miller

RESPONSE TO COMMENT LETTER 222 (MILLER)

222-1 Thank you for your comment. Also please refer to our response 12-1.

Department of Energy

Western Area Power Administration
P.O. Box 11606
Salt Lake City, UT 84147-0606

MAR 31 1992

Ms. Penelope Smalley
Team Leader
Vernal District
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Ms. Smalley:

Thank you for the copy of the "Fall 1991 Draft Diamond Mountain Resource Management Plan (RMP) and Environmental Impact Statement (EIS)." Western Area Power Administration (Western) is very interested in the planning activities of the Bureau of Land Management (BLM), particularly RMPs and EISs. We have reviewed the RMP and EIS and offer the following comments for your consideration:

223-1 1. Major transmission lines and pipelines are prominent linear facilities and could be represented on the maps for information and reference purposes to facilitate the review process.

223-2 2. Western owns, operates, and maintains the Flaming Gorge-Vernal Nos. 1 and 3 138-kV transmission lines across the Diamond Mountain Resource Area. These lines have been in existence since the early 1960s and constitute existing utility corridors. These existing corridors should be represented on the maps and those new corridors proposed under the respective alternative management plans should be considered as additional. The distinction between existing and proposed new corridors could be clarified in the RMP.

We appreciate the opportunity to participate in the Diamond Mountain RMP and EIS and hope these comments will be beneficial. If there are any questions, please telephone me at (801) 524-6375 (FTS 588-6375) or Lloyd Nelson at (801) 524-5869 (FTS 588-5869).

Sincerely,

Jim Tomsic

James E. Tomsic
Assistant Area Manager
for Engineering

RESPONSE TO COMMENT LETTER 223 (DEPARTMENT OF ENERGY, WESTERN AREA POWER ADMINISTRATION, Tomsic)

223-1 Thank you for your suggestion to include major transmission lines and pipelines on our maps. However, the myriad of information needed to be shown on all maps necessitated our including only the most essential data. In this the township/range grid, major roads and general topographic relief lines were considered sufficient information and reference guides for the general reader.

223-2 Only major corridor routes, whether existing or proposed, are shown on the priority management maps for the proposed plan and alternatives.

Chevron U.S.A. Inc.
6400 South Fiddler's Green Circle, Englewood, CO 80111, P.O. Box 599, Denver, CO 80201

April 1, 1992

J.F. NewVille
Manager, Environmental,
Safety, Fire & Health

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Dear Ms. Smalley:

Chevron has some serious concerns with the Draft Diamond Mountain Resource Area RMP with regard to its impacts on oil and gas leasing and operations. Alternatives discussed other than A establish a disturbing trend toward greater restriction on acreage that has traditionally been available for exploration within this basin.

224-1 There is no justification furnished in the Draft to support the dramatic increase in highly restrictive seasonal stipulations in wildlife areas or for expanding protection zones for raptors and sage grouse, nor is there any documentation that current management of oil and gas leasing and operations has resulted in population decreases which warrant increasing restrictions.

The proposed seasonal restrictions could potentially restrict access to an area from December 1 to July 15, 7 1/2 months of the year! This would make things impossible from an operations standpoint.

224-2 Precluding geophysical exploration on 14,460 acres of high potential lands would also prevent any possible exploration or development of the area because most companies would be unwilling to fight for access to an area with no seismic evidence of hydrocarbons. This would all but lock out this area of the RMP.

224-3 Restricting access for maintenance and operations is unacceptable! We understand this as meaning that if our well went down during any of the proposed restriction periods, we couldn't get to the well to restore or increase production. Would this apply to existing producing wells within the area or would they be grandfathered?

The area discussed is a large piece of Utah acreage and we don't feel this document strikes a "balance" between the environmental and mineral resources of the area.

Thank you for the opportunity to provide our comments and we look forward to seeing them addressed in the final document.

Sincerely,

J.F. NewVille

RESPONSE TO COMMENT LETTER 224 (CHEVRON USA, INC., NewVille)

224-1 Please refer to our response 212-2.

224-2 Under the proposed plan , level 3 and 4 lands would be open to geophysical exploration. Level 1 and 2 lands would be closed to significant surface disturbing geophysical activities. Refer to Table 2-15, under minerals.

224-3 The proposed plan has added or emphasized wording regarding maintenance and existing operations to most restrictions. Thus existing oil and gas activities would be allowed to continue at producing well sites.

RESPONSE TO COMMENT LETTER 225 (MCCOY)

March 30, 1992

Ms. Penelope Smalley
United States Department of the Interior
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Re: Resource Management Plans/Enviromental Impact Statement - The Diamond Mountain Resource Area

Dear Ms. Smalley:

C.W. McCoy Sheep Company is a closely held family corporation owned by the widow and sons of Clifton W. McCoy, son of Walter McCoy, who began grazing sheep on this public and private land in the late 1890's. The McCoy family has grazed livestock on these same lands for approximately 90 years. The following comments, general and specific were written by Paul W. McCoy, President and operator of the ranch, and John L. McCoy, Vice President.

SUMMARY OF COMMENTS

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GENERAL COMMENTS:

1. THE MANAGEMENT PRIORITY AREAS ARE AND WILL BECOME SINGLE USE CONCEPTS AND A WAY OF AVOIDING MULTIPLE USE ADMINISTRATION BY THE BLM.

(a) The Federal Land Policy Management act, 43 USC §1712 (c) (1) directs management of public lands for multiple use and sustained yield as FLPMA provides at §1702 (c).

(b) The use of MPAs artifically constrain the alternative uses for the lands in the DMRA in this document.

225-1 (c) We believe that implementation of the plan proposed in the EIS prejudices the property and livlihood of ranchers and other non-recreational and non-wild life users in the Resource Area and violate the principle of multiple use under which the BLM is required to conduct management actions and decisions.

(d) Areas of critical environmental concern: The MPA restrictions on these areas are in some ways more restrictive than wilderness areas: Wilderness can only be set aside as wilderness by Congress. Under what power does BLM take upon itself the ability to lock up these areas in the same way or more stringently than wilderness when these areas have not been decreed by Congress to have the criteria for wilderness or for inclusion in the Wild and Scenic River Act. Truly these areas have scenic value and as they are currently being so managed by multiple use, will remain so. Due mainly because of the rough and inaccessable characteristics of the areas.

(e) FLPMA provides for multiple use of land for some or

225-1 Please refer to the Summary at the beginning of this document for an explanation of the management priority area concept.

225-1 Cont.

all resources 43 USC §1702(C) it does not nesessarily follow that any one resource is to be given priority over another.

(f) Congress established the concept of "Principle or Major Uses" which, when terminated must be reported to Congress 43 USC §1712(e)(2). The uses included domestic livestock grazing, fish and wildlife development and utilization. Mineral exploration and production, right of way. Outdoor recreation and timber production. 43 USC §1702(c)

2. THE EVALUATION OF LIVESTOCK AS AN ECONOMIC FACTOR IN THE DMRA IS GROSSLY UNDERSTATED; BUT THE EVALUATION OF TOURISM AS AN ECONOMIC FACTOR IN THE DMRA IS GROSSLY OVERSTATED.

225-2

(a)As long time residents of the Uintah Basin, and persons who have been on Diamond Mountain for the elk and deer hunt every year since 1966, and members of a family which has grazed livestock on these lands for over 90 years, we were rather shocked to read the statement in the environmental statement by the Bureau of Land Management at page 3.53 wherein it stated that agriculture was the Uintah Basin's major economic base until the early 1900's. Agriculture was the Basin's basic economic support until after World War II, when the oil boom began to shift the economic emphasis in the basin from agriculture to oil. However, the oil and mineral extraction businesses have tended to have the effect of boom and bust upon the economy, and have caused severe economic stress in the Uintah Basin when they have declined suddenly, as recently as 1985. Agriculture on the other hand has remained a major factor in the economic base of the Uintah Basin and still remains so today.

(b) A further erroneous statement is found at page 3:53 of the EIS:

"Today farm and ranch incomes account for approximately five percent (5%) of the tri-county's personal income."

(c) No citation is made in the EIS as to the source of this information. An economic study from Dr. Donald Snyder of Utah State University in 1989 found in Research Report #129 of the Utah

225-2 The discussion of agriculture in the socioeconomics section of Chapter 3 has been changed. Please refer to our response 3-24.

Agricultural Experimental Station. The Size and Role of Agriculture in Utah and is readily available to any persons who inquire of Dr. Snyder shows that twenty-two and one-half (22.5%) of the Basin's economic activity in 1987 is attributable to agriculture. Thus it appears that the BLM understates the impact of agriculture by 400%, a difference which indicates that the EIS does not appear to be remotely accurate.

225-2 Cont.

(d) The role that agriculture plays is further denegrated by the statement:

"Agricultural employment plays a minor role in Basin economy."

(e) While such statements may be accurate from the records of the Department of Employment Security, many agricultural employees are not so registered. In addition, such statistics do not accurately reflect the economic activity of livestock ranchers, as the economic activity of ranches is, in general, carried out with relatively few employees. For the most part, the ranchers in the Uintah Basin live on or near their ranches and they and their families actively operate those ranches. There are very few absentee livestock operators which have lasted more then a few years. The major portion of the cash flow from agriculture is paid to the owners of the various ranches who in turn, spend these funds for petroleum products, supplies, equipment, vehicles, occasional employees, groceries and various items necessary to run a ranch.

(f) The bias of the writers of this particular section is quite apparent when the above statements are read in conjunction with the statements relative to recreation appearing on page 3.52. Table no. 3-23 appearing on page 3.53 which purports to show the economic impact of tourists, hunters and others visiting the area.

(g) This table is in part based upon the figure of $25.00 per day for economic benefits, a statement attributed to Governor Norman Bangerter in 1989 in a welcoming address to a 1989 meeting of the Utah Section of the National Wildlife Society. Such a

statement is hardly what any statistician would call a reliable source or scholarly studied information upon which decisions of government should be based. The authors take great pains in compiling Table No. 3-23 to show the number of visits to the various areas of DMRA (for some reason, the number of visitors and hours are all in round numbers. Could it be that these figures are estimates?) These visitor hours are multiplied by the above political statement of $25.00 per day for a supposed grand total of $24.96 million, which number cannot be in any way verified. Apparently the authors felt that the sum of $24.96 million, was a significant amount of money, even though it is an obvious guess.

225-2 Cont.

(h) On the other hand, statistics kept by the Utah Department of Agriculture show that the sale of livestock brought in over $ 54 million to the economies of Daggett/Duchesne/Uintah Counties in 1989. Why was this not a significant sum of money to the authors? Or is it insignificant because livestock generated it?

(i) From the foregoing it is apparent that the authors have grossly understated the economic impact of livestock raising in the Uintah Basin by ignoring statistics kept by the State of Utah for many years. Instead the authors chose to engage in speculation with respect to the impact upon the DMRA by attracting hunters, tourists and other visitors and thereby arrive at a figure that is 50% less than the proven economic impact of the livestock business upon the Uintah Basin and never once states the economic impact of the livestock business anywhere in the EIS statement.

(j) If, indeed, the statement in the last paragraph at page 3.53 is true that agriculture only provides 5% of the total income of the Basin and according to the Department of Agriculture it provided at least $54 million in 1989, then the total income of the tri-county area must be in the area of $920 million, which would be spread between mineral development and tourism, according to the statement of the EIS at page 3.52 that the income of the DMRS is from these three (3) sources. The 1989 gross income figures from mineral development

and extraction and the sale of minerals. However, the Gross Taxable Sales from all sources in the tri-county area including hotels and restaurants for 1989 were as follows:

Daggett:	$ 7,095,635
Duchesne:	77,103,454
Uintah:	156,126,866
TOTAL:	$ 240,325,955

225-2 Cont.

Source: Gross Taxable Sales By County and Major Industry, EDA, Tourism Study, Utah Office of Planning and Budget, Utah Department of Community and Economic Development, University of Utah, Bureau of Economic and Business Research, March 9, 1992.

(k) The above study was of taxable sales under Utah's Sales Tax. The sale of livestock from a ranch is not subject to such tax and was not included; however, the income from all tourism certainly is taxed and was included in these studies. The sums for food, lodging and other items used by all tourists for 1989 in the tri-county area barely approaches the amount of money attributed by the BLM to the DMRA. When the tourist attraction of Dinosaur National Monument, Flaming Gorge Dam and Recreation area, Ashley National Forest and other tourist attractions are considered; it is apparent that Table No. 3-23 is in no way accurate.

225-3

THE PROPOSED WILDLIFE AUM OBJECTIVES OF THE RESOURCE STUDY HAVE ALREADY BEEN ATTAINED AND SHOULD NOT BE EXCEEDED.

(a) Antelope: (Diamond Mountain) We feel that antelope is not a species that is needed or wanted on Diamond Mountain, with fenced pastures, and private lands and BLM lands intermingled, and lack of winter habitat and conflicts with other wildlife.

(b) Elk: (Diamond Mountain) We have needed a statement from the BLM as to forage available for elk since 1966. At that time a letter was sent out to permittees which allocated 100 elk for winter use and 50 elk for summer use. Elk population has exploded since that time to between 1000 to 1500 head depending on the severity of the winter and how good the summer is. The data on current use and objective use

225-3 Please refer to our responses 3-24, 104-3, 216-3, 219-2 and 225-6 concerning wildlife forage allocations. Antelope currently exist on Diamond Mountain on the Cooper Draw Allotment. They summer on Diamond Mountain and winter under Diamond Rim to the Jensen area. We recognize the problems associated with antelope and hope to work cooperatively with concerned individuals to resolve these problems. We believe elk issues on Diamond Mountain also can be resolved with the development of the herd management plan as required by the 1992 Utah State House Bill No. 25. The use of posted hunting units beginning in 1992 also offer the private landowner the option of obtaining an economic return for wildlife use on private land. We appreciate your information on current wildlife use on the allotments you are permitted to graze. We have completed prescribed burns in Dead Horse and Roller Draws in the past few years as examples of our commitment to resolve issues on allotments on Diamond Mountain. We will be working with you and UDWR during development of the allotment management plan. Of concern to us will be the development of additional water sources and other needed range improvements. Please refer to Appendix Table A8-3, which outlines proposed management opportunities for the Jackson-Crouse-Dry Hollow allotments. As discussed in Chapter 4, we recognize BLM's role in the ranchers' livestock operations.

populations contained in the EIS is 30 years outdated. On many allotments where current use is expressed in AUMs and converted to herd numbers on a 12 month basis, we know without doubt the current head count being used by BLM is not correct and reflects populations in 1966 or 1967. The objective use as expressed in AUMs on most allotments in this document would meet with little objection from landowners and ranchers. By our estimates, the current herd would need to be reduced by half to be in line with the objective use expressed in the EIS. The AUMs available in the objectives is fairly accurate, however, the elk population shown as currently physically present is grossly in error.

225-3 Cont

Elk are presently adversely impacting rest rotation grazing systems, deferred systems and new burns, by being present all year long. Livestock grazing is being blamed for any resource damage occuring on forage because the BLM has consistently proposed lowering the livestock AUMs. However, Big Game have a continuous impact upon the range by staying in certain areas for long periods of time. Livestock on the other hand, can be and usually are managed so that they do not concentrate in one area for too long.

(c) Big Game: Big game cannot be excluded from blame for causing damage to forage. BLM should be counting elk populations in a whole herd area and not stop as they have in the past at property lines, state lines, park boundaries, Indian reservations when counting, if the areas across these artificial boundaries are a part of the normal migration pattern of the wildlife herd.

(d) Moose: The EIS shows no moose currently grazing on our allotments. Such a statment is not true. Moose have been present on Diamond Mountain and have been observed by these writers since 1971. There are 20 to 30 moose present on Diamond Mountain at different times of the year, winter and summer. Eight moose have been observed in the Jackson Draw area the last 3 elk seasons. Ranchers in these areas have not preceived them to be a problem. Primarily because moose do not seem to be in large herds, but are solitary in nature.

(e) At page 8.5 is found table A2-1 which purports to set forth the current wild life use in AUMs by the numbers of deer, antelope, elk and big horn sheep. In the section involving Jackson/Crouse/Dry Hollow, which is one of the series of allotments which McCoy Sheep Company owns, the table shows the AUMs of elk at 211 for all three (3) of these allotments. It should be pointed out that all three (3) of these allotments have areas which elk feed on year round, so that the use by elk of those allotments will be for twelve (12) months. Those 211 head of elk convert over using a .75 conversion rate to 20 head of elk for the entire year for each of the three (3) allotments.

225-3 Cont

(f) The conversion rate of .75 to convert the AUM figure to the elk numbers actually on the allotments, converts to 56.8 elk the year round on all of those allotments. By actual observation, we can document that we will have elk numbers approaching 100 elk on each one (1) of these allotments, ie. approximately 100 elk during the year in our Jackson Draw allotment, approximately 80 elk in our Dry Hollow allotment and a number roughly approaching that in Crouse Canyon. The number of elk and the number of elk AUMs which the BLM is showing in its table as presently using those allotments is totally inadequate and not based upon a proper determination of the actual number of elk grazing on those allotments.

(g) Further, it is our position that we presently have upon these allotments more than the number of AUMs for elk, 512 shown in your column for the future objective wild life stocking levels on the Diamond Mountain area. The figures shown as objectives have already been met. No further increase in the elk population is necessary, and would cause hardship on the range land as shown below.

(h) It is quite inconsistent for the BLM in the EIS to take the position that it is desirable to increase the wildlife on these three (3) allotments and at the same time make the comments that the department has made with respect to these permits made at page A8.18 in which each one (1) of these permits is shown as having a class one resource

conflict/problem, that problem being the following:

"Existing water resources are insufficient to allow uniform distribution in the allotment as a whole or are unreliable. Some areas are being over-utilized near existing water; other portions of the allotment are not providing the number of AUMs authorized."

225-3 Cont

(i) The BLM should not allow or encourage an increase in the number of wildlife grazing on these allotments so long as these conditions are present. Wildlife grazes near water resources and contributes to the above problem in the same manner as livestock. We might add that the proposed solution to this problem, ie: the development of water sources on BLM property further from the primary riparian areas was repeatedly proposed by our father, C. W. McCoy to the BLM, whose response was: "If you do it, it will be solely at your expense and risk." Despite such a negative reaction, we developed several springs and reservoirs on BLM lands totally at our own expense which benefit all wildlife as well as the livestock. We do need the further development of water sources further from the primary riparian areas.

(j) Another aspect that the authors neglect to mention is that the matter of AUMs spent on public lands are generally a part of a year round system of livestock grazing that each rancher must have in order to maintain his overall operation. The AUMs in most cases grazed on public lands are merely a part of the year round livestock pasture rotation that is necessary to the successful livestock management and grazing management on a ranch.

(k) An example of faulty economic reasoning is the analysis found at page 4.60 wherein the authors state that by increasing wild life from 27,600 AUMs to 40,000 AUMs would only result in livestock reductions of 9,000 AUMs and that such a loss would only result in $11,500 yearly loss to the local livestock industry. No analysis whatsoever is shown to support such a conclusion. However, assuming that the 9,000 AUMs on BLM land is for a six (6) month period, that would result in a reduction in running capacity of a total of 1500 head of cows. The annual calf crop from those 1500

225-3 Cont

head of cows, assuming 100 calves die or not be born, (which is excessive) would be 1400 head of calves; and those 1400 head of calves would have a minimum market value of $450 each, for a minimum total loss to the livestock industry and local economy in cash flow of $630,000.00, not the $11,500.00 set forth in your analysis, a misstatement of $618,500.00.

(l) Further, the authors claim that the loss is to the "local livestock industry." Such a statment ignores the fact that this reduction in revenue is a reduction in revenue which the economy of the communities in the Basin as a whole would lose, not just the livestock industry.

4. NO INTRODUCTION OF SUCH ANIMALS AS THE BLACK FOOTED FERRET OR THE ANTELOPE IS WARRANTED.

225-4

(a) No objective proof exists that the black footed Ferret was ever present in the DMRA. The proposed "reintroduction" is in fact an introduction of a species which will create more conflicts with multiple use than we now have.

(b) Antelope would have difficulty dealing with the numerous fences in the DMRA, and further conflict with the elk herds and cattle now grazing on the DMRA. A substantial herd of antelope exists in Antelope Flats and other areas close to the DMRA and have not migrated into the DMRA probably because it is not suitable for their habitat.

5. NO FURTHER ACCESS ROADS SHOULD BE BUILT IN CROUSE/ JACKSON DRAW/DRY HOLLOW ALLOTMENTS.

225-5

(a) Access Roads: When new roads are planned on public land they meet with opposition because of environmental, wildlife, archaeological, considerations. We are opposed to any new roads on private land for some of the same reasons. However, because we are talking about private land, these considerations seem insignificant.

(b) Access roads through private lands, if a need truly exists, should be accomplished by cooperative land exchanges. If that fails then the roads should be made entirely on public land, and pass the test of

10

225-4 Please refer to our response 214-7 regarding black-footed ferrets; response 176-5 regarding impacts to the local community; and response 225-3 above concerning antelope forage allocations.

225-5 Public access through private lands on Diamond Mountain Plateau to public lands on Diamond Mountain Plateau was an issue identified in the scoping period at the beginning of this planning project. BLM has an obligation to provide the general public with access to public lands. However, acquisition of such access through private lands would only be completed with willing sellers or givers, as outlined in Chapter 2.

225-5 Cont.

public comment before they are built.

(c) No additional public access would be a positive, long term benefit for wildlife species sensitive to human activities in their preferred habitat. The development of further access roads is not needed in the Crouse/Jackson Draw/Dry Hollow areas.

6. THE ALLOTMENT INFORMATION AS TO C.W. McCOY SHEEP COMPANY IS ERRONEOUS IN MANY ASPECTS.

(a) Allotment Information contained in the EIS is erroneous in the following particulars:

(i) On page A8.6 Table A8-1, C. W. McCoy Sheep Company is listed as permittee on Marshall Draw allotment. We have never been the permittee on Marshall Draw.

225-6

(ii) We are listed as permittee on Jackson-Crouse-Dry Hollow allotments number 14812. The current season of use is not correct, our license reads; season of use as 05-05 to 11-10. The current acreage is incorrect; state lands are 1840 acres, instead of 2252 as published. On our Crouse property in the Allen Draw in Daggett County, the land status map shows: Sec. 16 T1S 25E SLM as a full state section. The NE 1/4; S1/2 Sec. 16 T1S 25 E SLM is owned by C. W. McCoy Sheep Co. Inc. since 1956, when it was purchased from DeJournette. This acreage is 480 acres. Taking 480 acres from the published 2252 acres would leave 1772 acres of state land, which is still not correct. On the land status map in Section 36 T1N 23E in Dry Hollow, it shows 160 acres of state land. There is 80 acres of state land in the South 1/2 of the SW 1/4 of Sec. 36 T1N 23E. Adding up Sec. 36 T2N R23E and Sec. 32 T2N R24E and the South 1/2 of Sec. 2 T1N R23E, all of which are in Jackson Draw, would be 1600 acres. That, and the 160 in Crouse and the 80 in Dry Hollow would add up to the 1840 acres that is currently leased from Utah State by C.W. McCoy Sheep Co., Inc. Adding the 480 from Crouse and 80 from Dry Hollow to the published private acres of 6344 would add up to 6904 acres, which is close to what we pay taxes on.

(iii) Our allotments have been monitored on cattle use for 20 years. An actual use study was conducted for

225-6 Referring to Table A8-3, conflict type #1 can occur whether sufficient AUMs are available or not. The Crouse Allotment has sufficient AUMs to meet livestock and wildlife requirements but water sources could be improved to better distribute both.

The paragraph referred to on p. 4.6 was printed in error. Please refer to our responses 52-2 and 104-3.

Corrections as noted have been made to Table A8-1 regarding the Jackson-Crouse-Dry Hollow Allotment.

three years; 1974, 1975 and 1976 to establish percent of use, and carrying capacity for change of use from sheep to cattle. Of these years, 1974 was very dry, 1975 was very wet, and 1976 was very dry.

225-6 Cont.

(iv) On our BLM allotments there are spring developments in the Dead Horse Draw, Whitey Roller Draw, (Crouse) Forkys Draw and Little Hole (Jackson). The two in Crouse were cooperative developments with BLM, DWR, and us . The two in Jackson Draw were constructed by C. W. McCoy prior to 1952, and are filed on by BLM. There are also 8 reservoirs that have been made prior to and after the Taylor Grazing Act, by ourselves.

(v) Our grazing allotments are in excellent condition taking into consideration the severe drought conditions that we have experienced in the last several years. Our private lands have been over utilized by wildlife during this drought to the extreme, because of watering places drying up on adjacent public lands. We must have a wildlife management plan to make our grazing systems work again. Objective wildlife stocking levels as published on Table A2-1 are a good way to start this process.

7. THE MAJORITY OF RIPARIAN AREAS IN THE DIAMOND MOUNTAIN RESOURCE AREA ARE ON PRIVATE LANDS.

225-7

(a) Riparian: The majority of riparian areas in the Diamond Mountain resource area are on private lands. The water on these lands have been developed and filed on for beneficial use in the State of Utah. When these lands were homesteaded by the first settlers the water was the most important consideration. These lands became the most productive lands in these areas and all life depends on, and are drawn to, these lush areas. Riparian, then, is of the utmost importance to the private landowners. Grazing allotments are dependent on riparian areas, and most allotments are used in conjuction with private lands. Plans to improve riparian areas on public land must include input by these landowners and water right holders. Water developments and land treatments to improve distribution of livestock and wildlife are the most effective way to improve riparian areas. Wildlife, also can impact riparian areas because they are present year long, and depend on the water and plants

225-7 Please refer to Chapter 3, riparian section, where it states most perennial streams, springs, and seeps are on private lands. Also see Chapter 4, under impacts to riparian habitat resources regarding concentrated wildlife use in riparian areas.

225-7 Cont. grown by the water.

8. MANY OF THE SOURCES USED TO COMPILE THE STUDY ARE INAPPROPRIATE.

225-8 (a) An examination of the references upon which the authors of the study shows that many of the references are unpublished masters theses, popular press items and at least one statement of a politician speaking before a wildlife group. None of these sources of information should or can be regarded as reliable scholarly sources of information upon which the administration of these public lands should be based, as they are not subjected to any peer review or any other process to guarantee the authenticity of the data or statements made therein.

CONCLUSION

It is apparent from the written text that the authors have not used proper financial and economic information to value the importance of livestock raising to the economy of the Uintah Basin, nor have they properly evaluated the economic loss caused to the local economy by reduction in livestock AUMs. They have further grossly understated the number of wildlife presently grazing on allotments and appear to recommend increases in wildlife upon these allotments while stating that these allotments are overgrazed near water sources when wildlife grazing is a part of the problem. In addition, the study recommends further public access roads while stating that such roads adversely effect wildlife. The recommendation as to reparian areas are mostly directed to areas of private ownership, which cannot and should not be affected without compensation. Further, the study is not based upon proper data or studies which have any proven basis, but is, in many areas based upon unpublished masters theses, guesses and statements of political candidates. Such erroneous information and reasoning, if retained, will serve as the foundation for improper policy decisions now and in the future, and should be removed from the BLM's analysis altogether. The Bureau of Land Management is a governmental entity and a quasi-judicial body when it makes decisions involving the administration of public lands as to the rights of the users thereof. A study is no better than the information upon which it is based. We have consulted with several range and economic experts who have reviewed these sources and find them to be totally inadequate sources and not

225-8 Please refer to our response 176-6.

having the credibility needed for a study as important as the DMRA-EIS.

Very truly yours,

C. W. McCOY SHEEP COMPANY:

By: Paul W. McCoy
President

By: John L. McCoy
Vice President

cc: Utah Bureau of Land Management
Washington Bureau of Land Management
Honorable Orrin Hatch, U.S. Senate
Honorable Jake Garn, U.S. Senate
Honorable William Orton, U.S. Congressman

DATE: March 30, 1992

TO: Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

FROM: Lynn Siddoway
319 North 850 West
Vernal, Utah 84078

RE: Diamond Mountain Resource Management Plan

This letter is to respond to the proposed Diamond Mountain RMP. I do not mean to be critical of the BLM or BLM employees. I feel that Alternative E, the preferred alternative of the BLM, includes rescourse management methods that are to restrictive on livestock and especially sheep permits. This document presents very emotional issues and in my response I have tried to be constructive. There is not a permittee in the Resource Area that is not affected by this document. I feel that the document is a threat to my total sheep operation, because of the management of the habitat for the reintroduction of wildlife species, raptors and new vehicle recreaction access roads.

I feel that Alternative E should not be adopted in its entirity, but should be intergrated with other Alternatives and in some situations completely rewritten.

I realize that the Team was made up of just people trying to interpret laws and regulations. These interpretations, however, are subject to personal biases.

227-1 The Management Priority Area Concept used by the Team is a difficult concept to follow throughout the proposed RMP. Although the RMP asserts that the use of MPA is in the interest of multiple use, management directives of the BLM, but give emphasis to different resources. The exclusionary effect of an MPA is made clear by the conclusion that only uses compatible with the priority use will be allowed concurrently. The designation "Priority" use violates FLPMA explicit direction and the legislative history shows that Congress rejected the identical concept proposed by the Public Land Law Review Commission.

RESPONSE TO COMMENT LETTER 227 (SIDDOWAY)

227-1 We believe the management priority area concept, as discussed in the Summary section of this document, is compatible with the principles of multiple use. FLPMA states that the "...goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law;...". It goes on to state: "...the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource and archeological values; that, where appropriate, will preserve and protect certain public lands in this natural condition...". We have made every reasonable effort to provide for the multiple use and enjoyment of public resources within the resource area. However, we have outlined reasonable restrictions in those level 1 and/or 2 lands in those instances where critical resource values have been determined to need protection and/or careful management. In these level 1 and/or 2 lands, allowing uses that are compatible with the resource values that placed the land in these levels, we believe, is consistent with the intent and letter of FLPMA.

Section: Chapter 2 Alternatives

	Page:	Comments:
227-2	2.39	Black-footed Ferret habitat-Alternative E is not acceptable. Alternative D is preferred. The Sunshine Bench is high on the priority list. The Sunshine Bench is part of the S J Hatch allotmentand is classified as in unsatisfactory range condition. The allotment is classified I. Managing to improve range conditions and create Black-footed Ferret habitat are in direct conflict because of the pratie dog communities. The Sunshine Bench is also used extensively as a livestock driveway. There is a considerable amount of private land near the Sunshine Bench. The small aircraft landing strip on the Sunshine Bench also has a lot of activity around the facility during the spring and fall months.
227-3	2.40	Wildlife Transplants-Alternative E is not acceptable. The management plans calls for introduction of Rocky Mountain Bighord Sheep. It also calls for a 10-mile buffer zone around reintroduction sites from domestic sheep. However the 10-milebuffer zone was not documented to any literature. The Desert Bighorn Council did in one of there transcripts recomment a 9-mile buffer, however this was not based on research it was just a recommendation. It seems that the size of the buffer zone should be based on topography and be highly dependent on the natural barriers that separate the species. In Nevada Bighors have been successfully reintroduced with a 2-mile barrier. Although, the several times bighorn reintroduction is mentioned in the document only one time does the document describe all the factors that govern successful reintroduction. Because of the serious impact these releases would have on livestock permittee's in these areas, very serious study and consideration should be given to these releases. I feel much more research is needed on the subject, as these releases are extremely expensive and can force me as sheep operator out of business. If Bighorns are to be reintroduced it should be with the smallest buffer zone needed so as not to waste resources and lower the impact on me and other sheep producers.
227-4		Pronghorn Antelope introduction on Diamond Mountain is not acceptable. The RMP does not state how special habitat will be managed. The problems I have experienced within the Bookcliff Resource Area with Antelope I feel like I am supporting all of the Antelope I can afford to. Diamond Mountain is a poor area for introduction because of 1) miles of restrictive fencing, 2) lack of water, 3) vehicle access and 4) illegal hunting.

227-2 Please refer to our responses 90-1, 176-5, 179-3, and 205-5.

227-3 Please refer to our responses179-22.

227-4 Please refer to our response 225-3.

2.41 Lands and Realty - Vehicle Access
The 5 Alternatives are not acceptable. The public vehicle access into the Lambson Draw violate management alternatives of other parts of the RMP for wildlife Management. Increasing vehicle access into tratitionally isolated low human use areas would negatively impact wild life and in particular, elk during the calving season. I have a verbal agreement with the UDWR to not graze the Lambson Draw until after June 10 to allow the
227-5 cow elk to use the area as a calving ground. Public vehicle access into this area would have a very negative impact on 100 head of cow elk.

I believe that public vehicle access for recreational purposes is already in excess on Diamond Mountain. The public access into this area was put high on the priority lise several years ago by a very biased BLM employee. Biases should not be in a scientific document.

2.46 The change of the grazing date from the traditional May 1 to April 1 on winter grazing permits is not acceptable. The critical date for spring grazing on winter grazing permits should not be the same for all permits. Each individual permit has many different variables. To make
227-6 a exact date for removal of all livestock from all permits is not acceptable. This statement fails to recognize vegetation management as the main objective and any management objective should be thought of in terms of the best possible management strategy for that goal.

To put an April 1 date for removal of sheep from a winter sheep permit would have adverse effects on every permittee. Where would these displaced sheep go for one month?

2.116 Table 2-18 Alternative E Special Emphasis Areas
The statement, Do not allow livestock grazing within Sears Canyon except for one day livestock trailing.
227-7 No domestic sheep grazing would be allowed, is not acceptable. The team members are unsure where the boundry for the Browns Park Complex ends and on the maps it is impossible to identify. Until this boundry is clarified all livestock grazing would be iliminated within Sears Canyon.

Section: Chapter 4 Impact Summary

Page: Comments:

227-5 Please refer to our response 12-1.

227-6 Please refer to our response 179-7.

227-7 The restricted use is below or north of the fence in Sears Canyon located at T1N, R24E, Sec. 23 SENW. This area is not part of the UDWR Management Area you are currently authorized to graze in. The area restricted to grazing is the steep canyon proper which presently receives only trailing use.

4.60 Under the heading Cumulative Impacts of Implementing Alternative E the statement:
Increasing vehicle access into traditionally isolated, low human use areas would negatively impact wildlife and, in particular, black bear and mountain lion habitat. although this alternative allows for the most miles of
227-8 increased vehicle access, seasonal restrictions or designated road limitations would offset these adverse wildlife impacts.
Once these access roads have been built the impact to wildlife is almost permanent. The RMP is not consistant in that some areas it wants to close access and in others it wants to open access. The direct costs of these access roads will be tremendous. The taxpayers money could better be spent on sound management projects.

CONCLUSION:

The publicity given the RMP in the local newspaper and on the local radio stations has been a good public relations efforts to let the uninitiated public know what a good job the BLM is doing under difficult conditions. Unfortunately creating this perception seems to be the primary purpose of the BLM today, rather than managing resources with full respect for the right and needs of all affected people under conservations principles and letting the informed public make judgements based on the merits of your on-the-ground performance. At best, the document is ambiguous, at worst deliberately ambiguous and self-serving.

Sincerely,

Lynn McDaniel 3/30/92
Sheep Permittee
Member Grazing Advisory Board,
Diamond Mountain Sheep Representative

227-8 We agree with your analysis and have deleted the paragraph. We are attempting to improve the public's access to isolated public lands while maintaining some form of remoteness. In this attempt, foot access only has been proposed for Allen Draw, Hoy Mountain, and portions of Argyle and Nine Mile Canyon where few roads currently exist. Vehicle access has been proposed for Jackson Draw, Lambson Draw, and Warren Draw where road systems are developed and access across through private land is needed.

RESPONSE TO COMMENT LETTER 228 (UINTAH MOUNTAIN CLUB, Durant)

Land is an organism. When we see land as a community to which we belong, we may begin to use it with love and respect.

There is no other way for land to survive the impact of mechanized man.

Aldo Leopold

UINTAH MOUNTAIN CLUB • P.O. Box 782 • Vernal, Utah 84078

27 March 1992

Ms. Jean Nitschke-Sinclear
Team Leader, Diamond Mountain RMP EIS
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

SUBJECT: Diamond Mountain Resource Management Plan Draft EIS.

Dear Ms. Nitschke-Sinclear,

After thorough review of the Vernal District's draft Environmental Impact Statement for the Diamond Mountain Resource Management Plan, the Uintah Mountain Club would like to submit its comments for the public record.

As the only active conservation group in northeast Utah, we are very conscious of our responsibility to speak out for the land. We are committed to responsible advocacy and dedicated to the preservation and protection of the ecological health and scenic beauty of the area we love. Far from being a "special interest group," we have no special interest other than sound resource management for the benefit of all the citizens of northeast Utah and the shareholders in the public lands across the nation. Although all our members benefit directly or indirectly from the commodity resources of the public lands, together we have put outside thoughts of personal profit and private goals to advocate balance and reason in the management of the public lands that are our common heritage.

It is interesting to note your quote from Leopold's *A Sand County Almanac* on the frontispiece of the draft EIS. This landmark work of conservation literature has profoundly influenced this writer and serves as the guiding "manifesto" of the Uintah Mountain Club. It is the "ecological conscience" --the land ethic-- to which you refer in your draft EIS that we invoke in both public land managers and in the community as a whole. But, as Leopold observed,

No important change in ethics was ever accomplished withou an internal change in our intellectual emphasis, loyalties, affections, and convictions.

With this draft EIS, the BLM Vernal District has made an bold start toward balancing the material and spiritual needs of all our citizens. It mirrors the "internal change" that is occurring in our society and appears to signal a new emphasis in your agency on managing the land as an organism.

The draft EIS and your preferred Alternative E is light years ahead of the last resource management plan completed by the Vernal District. However, while Alternative E is a big step in the right direction, there are several ways that it could be improved. Our comments will focus on ways in which the final EIS and your preferred alternative could be made better.

Whether your attempt to balance competing uses of the public lands withstands the onslaught of "one issue" groups will depend upon the professional commitment and collective will of your staff. The true "special interest" groups are easy to spot. Their concern over one issue betrays a lack of awareness of the ecological complexity of the land, a lack of sensitivity toward the spiritual, emotional, and material needs of other public lands users. Land as an organism--the land ethic--takes a back seat to their narrow agenda. We are confident that the Vernal District will maintain a steady course of wise, balanced resource management.

We sincerely appreciate the three years of work that went into this document. Your staff has been very helpful in meeting with our Natural Resources Committee to answer questions and clarify parts of the draft EIS. Your professionalism and dedication are clearly evident in the draft document. We look forward to a good "Final," and hope that you will seriously consider our comments and concerns in formulating the Diamond Mountain Resource Management Plan.

General

In general, this is a very good draft EIS. It is a comprehensive, ambitious, and innovative document that sets a new course toward enlightened public lands management on the Vernal District. The emphasis on riparian preservation and enhancement, rangeland improvement, protection of "special status" wildlife and plants, the introduction of once common indigenous specis, the recovery of endangered species, the acquisition of water rights for instream flow, and the designation of Wild and Scenic rivers is a refreshing departure from previous management direction. The aspects of the draft EIS that we especially like are summarized on page 3 of our comments.

There are, however, several things about the draft that could be improved:

228-1 **1-Lack of spectrum in Management Priority Areas.** There are obvious inequities in Table 2-1 "Management Priority Areas by Alternative" on page 2.15. When three of the alternatives have 0 acres of Level 1 land, one alternative has only 6,100 acres, and the acreage of Level 1 land in a fifth alternative jumps sharply to 96,000 acres, there is not a smooth continuum or spectrum that one expects from an appropriate range of alternatives. Neither is a complete spectrum of Level 2 acreages demonstrated within the various alternatives. There is quite a jump from <1% of lands in Alternative D to 45% in Alternative B. The only other points between <1% and 45% are 6 and 11 percent for Alternatives A and E, respectively.

A middling compromise or "mix" of management strategies would put the Level 1 and 2 acreages in in Alternative E closer to a point halfway between the minimum and maximum acreages described in the other alternatives. This would put Level 1 lands in Alternative E closer to 48,000 acres, and Level 2 lands closer to 150,000 acres (half of Alternative B). After all, if you can find 414,600 acres of land suitable for Levels 1 and 2 designation in Alternative B, you surely should be able to find 207,300 acres of these lands in Alternative E.

228-2 **2-The Ecological Systems Alternative is poorly named.** Alternative B is no more "ecological" than Alternatives A or E, because the concessions you make to wildlife and recreation really have nothing to do with maintaining the ecological health and integrity of the land. The "protection zones" and stipulations you chose for Alternative B management add little if anything to the preservation and maintenance of riparian areas, endangered or special status species, or

228-1 Please refer to our response 103-1.

228-2 Alternative B's overall management theme would maintain or improve the condition of ecological systems. However, it is intended to do so by restricting commodity uses and limiting vegetation manipulation and grazing management. In essence, the alternative would generally let nature take its course with less intensive management and greater restriction to public resource users.

228-2 Cont. biological diversity. Instead, labelling the alternative which imposes the most stringent and least understood restrictions on the livestock and hydrocarbon resource industries does nothing but give a bad name to ecology. We don't understand the stipulations and restrictions any more than they do! Barring people from the land for no good reason has nothing to do with the wise management of ecological systems.

228-3 **3-The socioeconomic assumptions are simplistic and divisive.** In Chapter 4 your characterization of social categories may "make for ease of analysis," but your assumptions are not helpful in describing the wide range of backgrounds and interests in our community. Can't "young newcomers" be "workers" or "business people"? In your analysis, "young newcomers" appear to be those city-bred busybodies who try to stop growth and development, while local folks, mostly natives, are just trying to scrape a living from the public lands. "Business people" appear to be for anything that brings in the bucks. In fact, the Uintah Mountain Club numbers all these groups among its members, and "where we're coming from" is our desire for balanced management between sometimes competing uses of the public lands. Your characterization reinforces the generalizations and misconceptions in our community concerning where traditional loyalties should lie. Though these loyalties and alliances still persist, we have seen enough exceptions in the last few years--coalitions and community projects--to undermine these comfortable assumptions.

228-4 **4-None of the alternatives gives enough protection to the slickrock between Red Mountain and Highway 191.** This is an area of incredible scenic, recreational, and cultural significance. It contains a beautiful arch, rare in this part of Utah. The rugged topography and diversity of landforms give a sense of solitude, remoteness and wonder to the recreationist. It is an exceptional resource when one considers that this ruggedly beautiful terrain reminiscent of the renowned Escalante canyon country is only fifteen minutes from town. The hiker in the middle of this ten-square-mile area can well imagine himself miles from the nearest road. This sense of insularity is important because one has to drive much further to other areas, with a relatively greater investment in time, to achieve this same sense of wildness and remoteness. In any case, this Navajo sandstone slickrock is great fun for the rambler afoot, and this area of the public lands is a favorite to hikers in our community.

Our advocacy for this area has been demonstrated many times in our letters to the Vernal District (see enclosed letters). In our letter dated March 7, 1991, and with our telephone calls, personal communications, and field trips to Moonshine Arch with BLM staff, we have demonstrated our concern for the proper management of this special area. Yet none of the alternatives in the draft EIS would effectively close the area to OHV use, which has been the single biggest threat to the integrity of the recreational, cultural and aesthetic values found there. The preferred alternative even designates most of the slickrock, including Moonshine Arch, as Level 3 lands! Our message is that this area should be given **special status** in all alternatives. We propose designating this area--extending from Red Mountain to Highway 191--as **Level 1** lands, the area would be managed to preserve, protect, and enhance the exceptional values contained therein (see topo map). Part of the management would be to close all slickrock east of Red Mountain to OHV use. (The jeep trail and some, designated spurs off of that established trail on Red Mountain would be left open to OHV use.)

228-5 **5-None of the alternatives would close the Ashley-Dry Fork area to phosphate development.** There is a glaring absence in the management decision spectrum here! To propose no mineral leasing withdrawals or exclusion of phosphate development in any of the alternatives, even in the *Ecological Systems* alternative, gives a primacy to mineral development in an area with a host of competing, non-commodity values. The area is very important for its aesthetic values, recreation and archaeological potential, and crucial and critical deer and elk winter range. At least a couple of alternatives--B and E--should have emphasized these non-commodity values by recommending full or partial mineral withdrawals on these lands. It is our opinion that the

228-3 Please refer to our response 167-2.

228-4 Please refer to our response 79-2.

228-5 Please refer to our response 61-2.

228-5 Cont. not reasonable to recommend phosphate development in all alternatives. BLM should also note the considerable public opposition that a proposal for phosphate mining has generated in this area.

228-6 6-**There is inadequate emphasis on protection for archaeological and paleontological sites.** In all alternatives except Alternative B there is no commitment to important cultural and paleogeologic sites (Table 2-13, p. 2.34). Again, we're talking about an inadequate spectrum of management decisions. This does not reflect the regional and national importance of this area and the potential of this area to yield sites of exceptional educational and scientific significance.

228-7 7-**No mention is made of the need for enforcement personnel and capabilities in the draft EIS.** Perhaps this is not a topic of discussion for and EIS, but the fact remains that only a fraction of the goals and objectives of this plan can be realized without some means of monitoring and enforcement. OHV use is one example where periodic monitoring for compliance and enforcement of restrictions is necessary. Fossil and artifact collection is another. It would have been refreshing to have BLM make a written commitment to monitoring and enforcement in the text of the draft EIS. We urge you make that commitment and to strive to acquire the personnel needed to implement this plan.

The Uintah Mountain Club supports the adoption of **Alternative** E as the best of the alternatives presented in the draft EIS, but we do not support all of its specifics. Alternative E is a pretty good alternative, but could be much better. In addition to the major problems we have identified with the draft EIS, we have identified the following problems with Alternative E. Modifications of your present preferred alternative will produce a more balanced and visionary resource management plan than the current version of Alternative E.

228-8 1-**There is not enough Level 1 and 2 acreage in the preferred alternative.** It is difficult for us to believe that within an area boasting some of the richest scenic, cultural, and biological values in the state, that BLM can't find more than 6,100 acres (Level 1) requiring restrictive management nor more than 81,000 acres (Level 2) requiring "careful" management. It is certain that many areas have pre-eminent values, the essence of which should be preserved at the cost of full utilization of other resources.

The Uintah Mountain Club feels that some areas, by their nature, have resource values that are scarce enough, fragile enough, and unique enough to warrant "careful" management in every case. In a general way, we have characterized these areas in tabular form on page 6.

We strongly feel that some areas should never be designated less than Level 2 under the Management Priority Area concept. Areas endowed with the resources we have listed on page 6 contain values that should not be jeopardized by less that Level 2 management. In total, they probably represent less than twenty percent of the lands within the Diamond Mountain Resource Area. Yet if the Diamond Mountain RMP is to be an effective guiding document for land management into the next millenium, it must formally recognize and designate those areas that will require special care in management. Land management plans need flexibility. But they need *in*flexibility as well. Otherwise a plan is not a plan, anymore than a budget is a budget if you don't stick to it.

BLM needs to designate more Level 1 and Level 2 lands, and commit itself to managing the resources within them with special care.

228-9 2-**There are not enough mineral and agricultural withdrawals in Alternative E.** Level 1 and 2 lands will certainly require some protective withdrawals. It is not important that the areas or the final acreage of withdrawals be determined at this time, although BLM will probably want to go ahead and designate some obvious withdrawals in exceptional areas.

228-6 Please refer to our responses 82-16 and 82-17.

228-7 We agree with your concerns for enforcement. You are also correct, the matter of enforcement personnel is not an issue for an RMP, but is an administrative concern.

228-8 Please refer to our response 61-1.

228-9 Thank you for your comments. We believe the amount of land proposed for mineral an agricultural withdrawal is sufficient to protect the critical resource values identified in the proposed plan as needing such protection.

228-9 Cont. We refer to the need for withdrawals in our **Table 1**. Lands should and could be withdrawn at any time and where appropriate to preserve and protect unique and important resource values. The Diamond Mountain RMP should contain words to that effect.

228-10 **3-Areas where off-highway vehicle use is excluded or restricted to designated roads and trails comprise only 10% of the resource area.** Off-highway vehicles remain one of the single worst agents for the degradation of the public lands, and Alternative E would open 90% of the Diamond Mountain Resource Area to no or seasonal restrictions (Allowing driver discretion on the 97,000 acres of land with "existing roads and trails" is tantamount to designating no restrictions.) We prefer that BLM not hold itself to these acreage numbers before a Diamond Mountain Resource Area Travel Plan is developed. We anticipate that more lands may need the "designated roads and trails" restriction than are currently identified in Alternative E.

Lands that we feel should be reasonably **closed** to OHV use are listed in the right-hand column of the table on page 4 (see item 5)

228-11 **4-The unroaded slickrock area east of Red Mountain is mislabeled.** This ruggedly beautiful area is labeled "Semi-primitive *Motorized*" on the ROS Classes map on page 3.42. This corrugated, incised area of narrow canyons, pour-offs, and ledges can in no way be reasonably characterized as motorized. It is in every way best suited for hiking, rock scrambling, climbing, and quiet reflection. In our countless trips to the area we have seldom seen or heard vehicles. (This is not to say that we haven't seen the destruction from the attempts of OHV users to penetrate the area, or the unsightly mess--beer cans, glass, and assorted trash--they almost always leave behind!) But the fact that OHV users *have* used the area should not lead one to the conclusion that it is full of roads, trails or the usual OHV terrain. Neither should the draft EIS imply that OHV use is a frequent and traditional use of the area in a way similar to lands that we all recognize as being favorite OHV playgrounds.

We urge you to change the label on this area with the final revision of the EIS. The change to semi-primitive, *non*-motorized would be the accurate portrayal of ROS class of these lands.

228-12 **5-There are no VRM Class 1 and few VRM Class 2 areas in Alternative.** Perhaps we are not visual resource connoisseurs, but it appears to us that there are plenty of "...natural areas...where landscape modification should be restricted" (VRM Class 1) How about the Wilderness Study Areas? The Red Mountain-Moonshine Arch area? The Upper Green River Scenic River? Sears Canyon? It is unacceptable to ask us to believe that you were unable to find any VRM Class 1 areas on 800,000 acres of land in a corner of the state renowned for its scenic beauty.

We protest your assertion on page 3.70 that "There are not Class 1 areas withing the resource area," and we strongly suggest that, at a minimum, you designate the Diamond Breaks and West Cold Springs WSA's and the Red Mountain-Moonshine Arch/Slickrock area VRM Class 1 in the final EIS.

228-13 We have provided specific critiques and suggestions for Alternative E in our Tables 1 and 2. The page layout of these Tables corresponds closely to the page layout of Tables 2-13 and 2-18 in the draft EIS. However, because we support and wish to improve Alternative E, we depict only a "revised, improved" Alternative E in Table 1. Suggested departures from the current version of Alternative E are shown in *italics*. Explanatory notes are included at these points.

Please refer to these two tables for specific comments on "Areawide Management Decisions" and "Management Prescriptions for Special Emphasis Areas."

5 228-10 Our analysis reveals that OHV use would be closed, limited yearlong or seasonally on 58 percent of the resource. Please refer to the decision summary for the proposed plan in Chapter 2.

228-11 The ROS classes were established in 1980 and updated in 1990. Please refer to Appendix 5 for the Bureau's ROS class standards. In noting the social setting factor, the semi-primitive motorized class should have low to moderate user contact frequency. Semi-primitive nonmotorized areas should have light user contact ("...6 to 10 parties encountered per day...limited evidence of previous recreation use..."). The Red Mountain area is a highly popular recreation area for OHV users as well as foot hikers. It is the area's popularity and proximity to Vernal that accounts for the current ROS classification. Again refer to our response 79-2 regarding proposed changes to OHV use in the area from the draft document.

228-12 We are basing our VRM classes on the 1979 VRM inventory of the resource area conducted by Phillip E. Flores Associates, Inc., from Denver. This inventory was conducted in accordance with established Bureau standards and criteria.

228-13 Thank you for your extended comments and proposed alternative. We believe your letter covers your major concerns and we have attempted to respond completely to them. However, for the sake of brevity only these tables and alternative are not duplicated in this document; they are available for public review in the Vernal District Office.

ACEC's

228-14 We applaud the proposal to create five new Areas of Critical Environmental Concern in the preferred Alternative E. However, we feel that the Middle Green River segment should be included in a Lower and Middle Green River Segments ACEC, as that Special Emphsis Area is depicted in Alternative B. We suggest this for two reasons:

1. The riparian values of the Middle Green River segment are accentuated by the predominance of private lands in the area, making the riparian resource on public lands even more crucial to the general management scheme.
2. The habitat value for T and E species is significant. The riverside cottonwoods are important for migrating bald eagles. Endangered fish species also depend upon careful management of the riverine and riparian environs.

228-15 It is clear from our analysis that, even though these areas are of "critical environmental concern," Alternative E's Management Priority Area designations of some lands in these areas are inappropriate (see Table 2 in our critique). For example:

The Red Mountain-Dry Fork ACEC would not exclude phosphate mining from areas of critical watershed, crucial wildlife habitat, and exceptional scenic and recreational values. The entire ACEC with the exception of the relict vegetation community on Red Mountain is designated Level 3.

This designation means that the area "would be open to most activities" but that those activities would only be "constrained somewhat" to accomodate other resource values. But does this make sense? Is this what the community wants?

The community has already spoken loudly and clearly on the issue of phosphate mining in this sensitive area. The Uintah Mountain Club and other groups have shown their concern for the area by formally nominating it as an ACEC, with suggested management guidelines to protect irreplaceable and sensitive resources (see our letters dated 11/2/88 and 2/22/89). And BLM has repeatedly acknowledged the important non-commodity values of the area in correspondence and in personal communication with us. You have heard our earnest pleas to do something to stop the degradation to the slickrock around Moonshine Arch.

BLM has demonstrated the extraordinary sensitivity of the area in the draft EIS. Consider:
Map 3-1 shows the area as a high density archaeological zone.
Map 3-2 shows that it contains an historic trail, the Carter Military Trail.
Map 3-3 shows that it is a high density paleontological zone.
Map 3-5 shows that it is a high priority elk habitat.
Map 3-6 shows that it is crucial mule deer habitat.
Map 3-23 shows that it contains significant riparian areas.
Maps 3-24 and 3-26 show that it has highly erodible soils in a critical watershed.
Map 3-33 shows that it is an area of high visual sensitivity.
The transparent overlays for these maps show a clustering of important resource values in this proposed ACEC. But judging from the MPA designation of these lands, nothing seems to be of "critica environmental concern" in this area. Alternative E does not even specify "careful" (Level 2)management for the ACEC through Level 2 designation of sensitive lands. "Active" management by which potentially demaging activities are "constrained somewhat" (Level 3) just is not sufficient for the Red Mountain-Dry Fork ACEC. BLM needs to go back to the drawing board, and should designate substantially more Level 1 and Level 2 acres in this ACEC.

6

228-14 Our analysis found the river to have critical habitat for endangered animal species. However, because of the limited amount of public lands along the segment (20 percent) and opposition to designation by county governments and the Ute Indian Tribe, the middle segment of the Green River was dropped from further consideration. Please refer to Appendix 7.

228-15 The Red Mountain-Dry Fork ACEC has been modified to exclude phosphate mining between the areas of Ashley Creek Gorge and Dry Fork Creek. Such a modification is consistent with the public's wishes as expressed in the comment letters received. We believe the management levels proposed are consistent with the overall management theme of the proposed plan, adequately protects the critical resource values within this area, and allows the public to use the more abundant resources of this area.

228-15 Cont. The Uintah Mountain Club has a specific proposal for the Red Mountain-Dry Fork ACEC. We hope that you will see the merits of our suggestions, as they are a logical extension of the comments and suggestions we have made to BLM over the years. In an improved Red Mountain-Dry Fork ACEC, BLM would incorporate the following management decisions:

1-Designate Red Mountain and all slickrock on BLM lands between Red Mountain and Highway 191 as **Level 1**. (see Map 1)

2-Designate lands east of Highway 191 and north of Red Fleet Reservoir, including the Red Fleet formations themselves, as **Level 1**. (see Map 2)

3-Designate lands between the Dry Fork Settlement and the Forest Service boundary, including Alma Taylor Hollow and the Springs, as **Level 1**. (see Map 3)

4-Designate all other lands in the ACEC as **Level 2**, to reflect their sensitive nature and importance to the quality of life in the Vernal area.

5-Leave the jeep trail on **Red Mountain open to OHV** use and designate other, appropriate trails in the area for motorized use. **Close** the slickrock country between Red Mountain and Highway 191 to OHV use.

6-**Withdraw** the area from further mineral leasing.

7-Make the **acquisition** of State section 16 on Red Mountain and other State and private lands adjoining the Red Mountain-Moonshine Arch area the highest priority.

8-Make the acquisition of State and private lands at the mouth of Ashley Gorge a high priority.

9-Establish a network of **hiking and horseback trails** to enhance the recreational potential of this area so close to the community.

10-Establish **interpretive facilities** at cultural, paleontological, and geological sites.

Wildlife

228-16 We applaud BLM's wildlife initiatives in this draft EIS. Your proposals to introduce bighorn sheep, river otters, black-footed ferrets, and upland game birds are laudable. But we feel that there is room for improvement in Alternative E, and our specific comments are found in Tables 1 and 2.

Wild and Scenic River Status

228-17 A progressive move. Northeastern Utah enters the twentieth century! We totally support your proposed designation under Alternative E.

Riparian Areas

228-18 All riparian areas should be given Level 1 status because of their uniqueness, scarcity, and relative importance in the ecological scheme of things. We are pleased with the new emphasis BLM is placing on riparian areas.

Special Status Plant and Animal Species

228-19 Today's sensitive and Category 2 species are tomorrow's T and E species. All special status species need special protective stipulations and restrictions on potential habitat disturbing activities. Our suggestions are outlined in tabular form (see Tables 1 and 2).

7

228-16 Thank you for your support.

228-17 Again, thanks for your support.

228-18 We believe the critical riparian areas are afforded adequate protection in levels 1 and 2. Those riparian areas within level 3 will be afforded protection and management without adversely restricting uses on surrounding nonriparian areas.

228-19 We believe the proposed decision regarding special status plant species provides the protection needed to enhance the recovery of listed species, and to prevent the need to list category species.

8

OHV Use

228-20 The draft EIS does not adequately address the issue of mountain bikes. Mountain bike use is growing rapidly and restrictions may soon be needed to protect vegetation, fragile soils, and other resource values. BLM should also consider potential conflicts between mountain bikers and other recreationists. The Vernal District could draw on the experience of other BLM districts to develop a general management direction toward mountain bikes use. Mountain bike restrictions must be considered in the planning process and added to the final EIS/RMP. We feel that most Level 1 lands should be closed to motorized OHV and mountain bike use

Recreation

228-21 We oppose developed recreation in the Red Mountain-Moonshine Arch area. This area is better suited to semi-primitive recreation. Trailheads for hiking and OHV use would be appropriate, but on-trail interpretative and directional signing are unnecessary and detract from the sense of remoteness and adventure.

The Vernal District should preserve all the primitive and semi-primitive, non-motorized lands it has. These represent a small percentage of the Diamond Mountain Resource Area, and they will become more precious and important as time goes on. It makes no sense to change the ROS of a primitive or semi-primitive, non-motorized area. The potential exists to change the character of the area--the solitude, the sense of remoteness, the wildness--far into the future. This would negatively impact the quality of life and the range of recreation opportunities for many public lands users who enjoy the non-motorized experience.

While 94% of lands on the Diamond Mountain Resource Area would be open to motorized recreation use under Alternative E, only 6 % would be free from OHV's. This is an imbalance in the ROS that should and must be corrected!

We strongly urge BLM to preserve all the semi-primitive, non-motorized lands in the resource area by adopting the acreage in Alternative B (see Table 2-13, p. 2.52). We further that it amplify the acreage in these lands by changing the inexplicable designation of the slickrock, "mini-Escalante" lands east of Red Mountain to semi-primitive, non-motorized status. (see map)

Summary

Alternative E is a big step forward in resource management for the Vernal District. There are some inconsistencies in the draft EIS and in Alternative E which should be corrected before the "Final" goes to press. These shortcomings are relatively few, but if they are not corrected they could have a profound influence on the integrity of the public lands in the Diamond Mountain Resource Area over the next 10-15 years. We are aware that increasing the total number of Level 1 and Level 2 acres will trigger other changes as well. But we insist that Alternative E relegates far too much land to MPA designations that don't specify "careful" management by definition. Increasing Level 1 and Level 2 acreage is the right thing to do, even if it means making some substantial--and bothersome--adjustments.

We urge the planning team to consider our comments and suggestions carefully. If implemented, they would not have a significant impact upon either the commercial use of the resource area or the opportunities for those who prefer motorized recreation. We hope that, in the final analysis, you will incorporate many of them into the Diamond Mountain Resource Management Plan.

228-20 Thank you for your comments. Recreation trails will be monitored and maintained. Should trails and/or their associated areas shown signed of overuse by OHVs, mountain bikes or foot traffic, corrective actions would be designed and implemented.

228-21 Again, we refer you to Appendix 5 which outlines the criteria used in classifying lands in the Recreation Opportunity Spectrum. Please refer to the proposed decision regarding management of the identified semi-primitive nonmotorized areas of the resource area. We believe we are in agreement with you. Referring to your concerns of OHV use on the Red Mountain slickrock area, please see our response 79-2.

Thank you for all your hard work and attention to our concerns. We look forward to working with you in making the new RMP a success.

Best regards,

Will Durant
Chairman, Natural Resources Committee

March 29, 1992

Jean Sinclear, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Regarding: Diamond Mountain Resource Area Management Plan and Environmental Impact Statement

Dear Team Leader

241-1 We the under signed having had the opportunity to hike in the Mame Hole/Bear Hollow area of Diamond Mountain, respectfully request that nothing be changed by the BLM. If a change must be made the we recommend that plan "C" be followed, resulting in the least change possible.

Respectfully,

1 Benjamin D Hacking
2 Nathaneil jr. Hacking
3 Adrienne J Hacking
4 Samuel B Hacking
5 Joseph D Hacking
6 David L Mugleston
7 Carol Mugleston
8 Spencer Mugleston
9 Jane Mugleston
10 Julie Mugleston
11 Mark Mugleston
12 Brian Mugleston
13 Thomas E. Hacking
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RESPONSE TO COMMENT LETTER 241 (HACKING & MUGLESTON)

241-1 Thank you for your comment.

ROBERT F. FALLON, JR., M.D., F.A.C.S.
General Surgery
175 North 100 West, Suite 102
Vernal, Utah 84078
(801) 789-0878

March 31, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, UT 84078

Dear Ms. Smalley;

I am writing to comment on the Draft Diamond Mountain Resource Area RMP and EIS.

I have recently moved to Utah, but have lived in rural areas of New Hampshire, Vermont, California, Washington and New York. I am an environmentally conscious outdoorsman who lives in a wood house heated with hydrocarbons, surrounded by a fertilized lawn, that was built in a deer winter range, on a 100 year flood plain. I am a physician who could practice anywhere in the United States, but choose Vernal and North Eastern Utah because of the varied outdoor activities in an area with a reasonably diverse economy.

For these reasons, I support Alternative E as outlined in the RMP/EIS. Alternative E, to my mind, protects all of the resources in the area - the diverse outdoor recreational opportunities, the range and the economically vital extractive activities. It is vital that we utilize available range, water and minerals in a fashion that minimizes "impact" and maximizes long term preservation of the gifts we are guardians of.

243-1 I have not lived here long enough to have in-depth perspective on many specific issues. I do agree with the areas designated as ACEC's. I am concerned about allowing surface mining of phosphates west of the current mine between Red Mountain and Dry Fork. That is both magnificent country and vital game range.

243-2 I agree with the priorities for vehicular and foot access to areas outlined in Table 2-13 page 241.

243-3 I've heard rumors about a new road providing more direct access from Little Hole to Browns Park. Big Mistake. Some things are nice precisely because they are hard to get to, and access (and over utilization) ruins them.

243-4 I had trouble finding specific references in the RMP/EIS, but from my perspective of living in various places, water and raparian zones are vital to the environmental health of an area and these features would be vigorously protected.

Thank you for your efforts. Could you please add me to your mailing list for items relating to the RMP.

Sincerely,

Robert F. Fallon, M.D.

RESPONSE TO COMMENT LETTER 243 (FALLON)

243-1 Please refer to our response 112-1.

243-2 Thank you for your support.

243-3 No formal proposal has been received regarding a Little Hole to Browns Park all-weather road. When such a proposal is received, a formal environmental assessment will be prepared to discuss and analyze the specifics of such a project.

243-4 Please refer to Table 2-15, for proposed decisions regarding riparian areas (decisions for the proposed plan are offered for comparison in this table). Also refer to Appendix 6 for the Utah State Riparian Area Policy.

Brent B. Hacking
18905 S.E. 43rd Street
Issaquah, Washington, 98027

BBH-05-92 (206) 746-0297 March 28, 1992

Penelope Smalley
Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah, 84078

Subject: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Alternative of Choice: Alternative "C" Forage Production with limitations

Dear Ms. Smalley

As an owner of property in the Mame's Hole-Bear Hollow area I am totally against any development or burning in this area.

244-1 After reviewing and evaluating the alternatives, I could support Alternative "C" with reservation. If you are talking about burning 200 acres of BLM land it would be mostly on the top of the mountains where the conifers and Quaking Aspens trees are located. If you are talking about burning 200 acre of private land then I am definitely not in favor of it.

244-2 The Mame's Hole - Bear Hollow area is currently closed to public deer hunting. Thus helping to preserve nature. We do not want large numbers of people walking over and destroying the plants and land.

As a Civil Engineer I understand what it takes to build a road into an area. My evaluation of what you are proposing in regards to the road and visitor sites in the Mame's Hole - Bear Hollow area is that you will be making an eye sore out of the meadows and the hill sides. In the process of construction you will end up taking out a lot of natural formation, springs, and the best grazing land.

It sounds as though you are planning on putting reservoirs in the tops of the mountains as most of the flat lands are privately owned.

244-3 On the "Grazing Allotments and Major Roads" map it implies the private land is under a BLM Grazing permit number.

RESPONSE TO PUBLIC COMMENT LETTER 244 (Hacking)

244-1 The 200 acres designated in Table A8-4, for the Mame Hole-Bear Hollow Allotment refers to pinyon-juniper proposed to be burned on BLM-administered lands. The reservoirs would be built on public lands also. Any range improvement work would be completed with the knowledge of the involved grazing permittee.

244-2 Please refer to our response 12-1.

244-3 The Mame Hole-Bear Hollow Allotment is licensed on a percent federal range basis and the private lands within the allotment, unless fenced, are part of the grazing permit agreeing to the season of use designated and the numbers of livestock permitted.

244-3 Cont. As a tax payer I am concerned that we are about to spend a large quantity of money to put a new road through a previously un-disturbed area when their are currently other road ways through the area. Why are we doing and what is the cost?

244-4 The report also seems to favor the recreationalist and sportman e.g. increasing the number of wildlife over cattle. Please be aware that people are still making their living off the Mame's Hole - Bear Hollow private land.

Once again, I would prefer that nothing be done in the Mame's Hole - Bear Hollow area.

Sincerely

Brent B. Hacking

Brent B. Hacking

244-4 Thank you for your comment.

RESPONSE TO COMMENT LETTER 245 (HACKING)

6212 So. Orchard
Tacoma, Wa. 98467
March 28, 1992

Jean Sinclear, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Regarding: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Dear Team Leader,

As I have been looking at the Diamond Mountain Resource Management Plan/Environmental Impact Statement (RMP/EIS), I wonder why after all the years that Diamond mountain has been under the control of private ownership, with no adverse effect on the mountain, why it is necessary for the B.L.M to take over control of the area and access it to the public. If history is any indicator as soon as the general public has access to an area that area will soon be ruined, unless all of that area is reguarly policed and maintained.

My main focus of concern is the Mame Hole-Bear Hollow area owned by Grant L. Hacking Family. For Forty-five years I have watched my father very carefully maintain and make improvements to this area. He has added several reservoirs in the valley below Mame Hole and enlarged the ones in Mame Hole and Bear Hollow. these reservoirs are used by cattle that he runs there and by the dear, elk and other wild animals that live in this area. He has put out salt for his cattle which has been used by the wild animals also. As we have hiked in the hills and driven along the county road we have counted an ever increasing number of deer, elk, rabbits, prairie dogs and other wild life. If this work and improvements had not been done by the private landowners, who truly care for the land, the wild life would not have been able to increase.

After I graduated from Uintah High School I had the opportunity to work for the U.S. Forest Service. One of our responsibilities was to go to the various campgrounds and perform maintenance on the facilities. We spent most of that summer repairing and keeping the facilities useable for the public. Some of the maintenance was for winter damage, most was for the use/abuse of the general public. If a road is built into Mame Hole/Bear Hollow and campgrounds constructed they would necessitate a great deal of money to construct them and even more to maintain them. It would also deplete the available grazing land for the cattle and wildlife. If the public has access to these areas they will drive the wildlife, who now co-exist with the cattle, out of their habitat with nowhere to go except into a steadily dwindling accessible area.

During the summer of 1991 we had the opportunity to go to Fantasy Canyon in the Red Wash area. As we were driving along the public access roads to the canyon, many of the once beautiful hillsides were scarred with the ruts of 4-wheel vehicles. These ruts not only detract from the beauty of the area, but also cause erosion, and a destruction of the few native plants that can grow in the area. If Mame Hole and Bear Hollow are opened up to public access, this same wanton destruction will occur in an area, where except for a few judicious improvements, the land is still the same as it has been for centuries.

245-1 My family and I are opposed to any "improvements by BLM" being done to the Mame Hole/Bear Hollow area. We would like to see it left as it is. For over a century the wildlife and cattle have co-existed with an increase in the numbers of wildlife. If "improvements" must be done, those proposed by plan "C" are the only acceptable one's. These "improvements" should only be done after very careful study and consideration of the Mame Hole/Bear Hollow area weather and terrain conditions.

Respectfully yours,

Douglas G. Hacking

Douglas G. Hacking

245-1 Please refer to our responses 12-1 and 53-1.

JANET T. MILLIKAN

Tues, Mar. 31, 1992

P.S. I am very much opposed to the proposed new Highway which Sen. Bill Orton backs — it duplicates the Colo. Road 50 miles East, + is a waste of Tax Dollars -- we don't have enough $ in Utah to maintain our roads as is —

Mr. Ron Trogetad
Diamond Mountain Resource Area Manager
170 South 500 East
Vernal, UT 84078

Re: Diamond Mt. RMP

Dear Mr. Trogetad:

I am an Artist - Painter and Photographer and avid Flyfisher.

I favor your Alternative B. Alternate E does have some good features.

246-1 I applaud you for opposing bear baiting.

246-2 Always, I am ~~appalled~~ appalled at chaining Pygmy Forests -- They are Forests, and just because they are Pygmy, they are no less important -- Pinyon Pine + Juniper grow where they do because the ecosystem is appropriate.

Cattle, in my opinion do not belong in Forests - I am from Iowa + Minnesota, so I have a broader viewpoint. We are so used to a cow/cowboy mentality in the West, that we are allowing tremendous damage to our streams, habitat, etc -- + spending millions of dollars doing this -- many of the big Ranchers, who profit from our Taxpayer dollars are driving Cadillacs in large cities, etc —

Sincerely,

Studio
3817 Brighton Point Drive
Salt Lake City, Utah 84121

RESPONSE TO COMMENT LETTER 246 (MILLIKAN)

246-1 Please refer to our response 114-34.

246-2 Treatment of pinyon-juniper woodlands would be completed to improve the watershed condition, provide additional forage for both wildlife and livestock, and allow for a healthy, vigorous natural vegetation composition, of which pinyon-juniper play an important role.

(2) Mar. 31, 1992.

Obviously, cattle will remain in the West. But, please, let's not give them 9,000 more acres. And, if you do insist on this, please do so by fire, a natural phenomena.

246-3 ORV use -- All riparian areas should be closed to ORVs -- all ACECs + Wild + Scenic Rivers should be closed to mineral development. (just designated roads, please)

246-4 I have fly fished out of Brown's Park, and I am amazed that you would consider allowing mineral entry around there, + the Nine Mile Canyon ACEC -- these areas should be closed to mineral entry. Category 1 + 2 lands should be closed to mineral entry, including Ouray National Wildlife Refuge. Same for Diamond Mountain, where the potential is low, anyway.

246-5 Your Dept. needs to consolidate land holdings on Diamond Mt., so as to retain control -- otherwise, with "Checkerboard" holdings, issues become confused.

If you use Alternative E, please do improve it along the above lines.

246-6 I support ACEC Recommendations, Wild + Scenic River study for all of the Green River, + no lease mineral recommendation on sensitive lands, + no chaining of Pygmy Forests —

Yours truly —
Janet T. Milliken

246-3 Please refer to our response 117-3.

246-4 In the proposed plan the areas adjacent to the upper and lower Green River would be recommended for withdrawal from mineral entry. Until the withdrawal is approved in Washington, the ACEC designation along the river would require a plan of operation prior to any surface disturbance greater than 5 acres.

246-5 Thank you for your support.

246-6 Again, thank you for your support.

Ron Trogstad 3/27/92
Diamond Mtn Resource Area Mgr
170 S 500 East
Vernal, Utah 84078

Dear Mr. Trogstad:

247-1 I'm writing to you to express my concern about the pending management decisions on the Diamond Mtn. area. I strongly support alternative B as the option which will most fully protect the valuable wilderness of this region. I would also like to urge the BLM to strongly oppose any bear baiting in this area. It's time our wildlife populations are freed from this senseless barbarism.

247-2 I support the ACEC recommendations and I would also like to see wild and scenic river status for this stretch of the Green River.

Sincerely,

James Kay

RESPONSE TO COMMENT LETTER 247 (KAY)

247-1 Please refer to our response 114-34.

247-2 Thank you for your support.

DUCHESNE COUNTY ROAD DEPT.

P.O. Box 356 Duchesne, Utah 84021 84021
801-738-2468

March 31, 1992

Jean Sinclear
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Dear Ms.Jean Sinclear:

We are writing to you to comment on your Diamond Mountain Resource Area, Resource Management Plan and Environment Impact Statement. There are two areas that are important to the County the first being tar sands and the second sand, gravel, and shale pits.

248-1 We have found some discrepancies in the Assumptions on page 4.9 in the section called Tar Sands. The impact to Duchesne County was not expressed well enough, Tar Sands are a valuable resource to Duchesne County and a important product to the PUBLIC. If Duchesne County were allowed to receive tar sands in the Pariette then the County could save $275,000.00 a year or more. It now costs the County $200,000.00 to purchase tar sands from John E. Fausett for one year. It costs us $75,000.00 or more to haul the product after it is crushed, to the job sites. The Fausett pit is in Whiterocks and approximately 26 miles from Roosevelt Utah. The farthest job site has the potential of being a distance of 73 miles from John E. Fausett's Tar Sands Pit.

In the Alternative E Plan there are no Tar Sands available in the Pariette area. In the Summery of Impacts on page 4.67 it states that:

> Development of tar sands in the Pariette STSA would be precluded under this alternative. This would delay or preclude paving of roads in the area.

The County would like to see a small section opened to tar sands use on the Pariette STSA. We petition the BLM to reconsider and open up a few small test sections. The area we are most interested in is Section 30 T8S R18E SLB&M. The County with the BLM has been on the site, there is an existing road to the site that needs little improvement to access the tar sands. The County Surveyor and County Road Department have prepared a plat

RESPONSE TO COMMENT LETTER 248 (DUCHESNE COUNTY COMMISSION)

248-1 Your concern regarding possible development of tar sands, a leasable mineral, within the Pariette STSA has been clarified. Please refer to Tables 2-15 and 2-16 for proposed decisions involving tar sands in general land within the proposed Pariette ACEC, respectively. Please also refer to Map Packet #8, which portrays the generalized leasing categories for oil, gas and combined hydrocarbon activities. We would consider tar sands development on a site-specific basis, so long as individuals and/or habitat for special status plant species are not adversely affected.

(RMP/EIS) was completed. The County anticipated that the BLM in their Resource Management Plan would take into consideration all of the past work and time the County has put into this site.

248-1

Duchesne County crushes the tar sands and places them on the roads with graders, this has been quite successful for the county and is substantially cheaper than road mix. Paving roads provide safety to the public and helps the environment by reducing dust and erosion on the lands. Road maintenance is minimal after the road is paved thus reducing additional costs to tax payers.

Mineral Materials (shale)

The County depends on the BLM's "Free Use Permits" to place shale on the roads in out of the way areas, private lanes and low impact roads. The County Road Department uses shale as a beginning road base then they use gravel and cover it with tar sands. Having access to more than one shale pit is also important to the county because it cuts down on hauling milage. The Road Department is able to maintain the roads in the areas near each shale pit to a higher standard because of the savings from minimal hauling milage.

248-2

On the Alternative E Map we believe there are too tight of restrictions in the Nine Mile Area. There are few places that the soil is right for shale removal and that have access with minimal damage to the lands. It not only cuts down on hauling costs it also saves the tax payers money to have access to the shale pits. If the County didn't have the shale pits it would cost us an additional $100,000.00 in one year to maintain the roads in the area.

We hope you will consider our needs as you prepare your final Plan. If we can be of any further assistance please let us know. You can call the County Road Department at 738-2468 and Leon Fillingim or Nancy Bird can answer any of your questions or will be happy to assist you in finding your answers.

Board of County Commissioners:
Duchesne County, State of Utah

By. R. L. Reynolds ..... Date. Mar. 31, 1992.
Chairman

Member

Member

nb

248-2 Under the proposed plan, we have taken steps to consider the needs of the counties and other mineral material developers. Most restrictive areas in the Myton areas are on lands considered to be Category 2 (open with restrictions). A stated in the document, we recognize that in some instances seasonal restrictions may not be feasible for mineral material development. In those cases, we would consider other development options. Also, under the proposed plan we would consider allowing mineral material development on a site specific basis even in the most highly restricted areas in the resource area.

March 31, 1992

Penelope Smalley, Team Leader RMP/DEIS
Vernal District, BLM-USDI
170 South 500 East

Dear Team Leader:

First, a thank you all for allowing a 90-day comment period, the comments should be more thoughtful and indepth as a result. The usual 30-day agency period is just too short.

For the most part, I'm relying on the special interest groups to respond/comment on the technical ecologically and social-economic discussions and omissions in the DEIS. The volume of material, subjects, and alternatives are just too massive and intimidating for one individual in the general public to handle. However my overall impression of the statement is one of professionalism and quality craftsmanship.

249-1 I am just a little confused about the purpose of the Resource Management Plan (RMP) as stated on page 1.1 in the second and fourth paragraphs. The statement in the second paragraph seems to infer that decisions are being made. Then, in the fourth paragraph this statement is made "It is not a activity-specific plan intended to make specific program decisions for all individual resources; rather, it is designed to provide overall multiple-use objectives and management direction"... what I'm hearing is that the RMP is only restating existing generalized public land policy and direction contained in laws, regulations, and BLM manuals and that site-specific day-to-day commercial and non commercial use (and misuse) decisions will continue

RESPONSE TO COMMENT LETTER 249 (YOUNGER)

249-1 As stated in Chapter 1 the Diamond Mountain RMP is designed to give broad, general management for public lands within the resource area. The reasons why an RMP is necessary at this time are also presented. That the RMP is only "...restating existing generalized public land policy and direction..." is not quite accurate.

249-1 Cont. I think we all know that policy and national guidance (direction) has not been the problem, its been the lack of political will to implement and carryout the national direction at the state and local level. It looks like the current status quo will continue, what has changed by writing a subjective RMP that invites exceptions, modifications and deviations?

Two specific suggestions:

249-2 (1) Enlarge the Glossary Section to include additional technical and subjective words such as:
- Balance (page iii), ecological stability or management policy;
- Irreversial, a political or ecological decision?

and, there are many others,

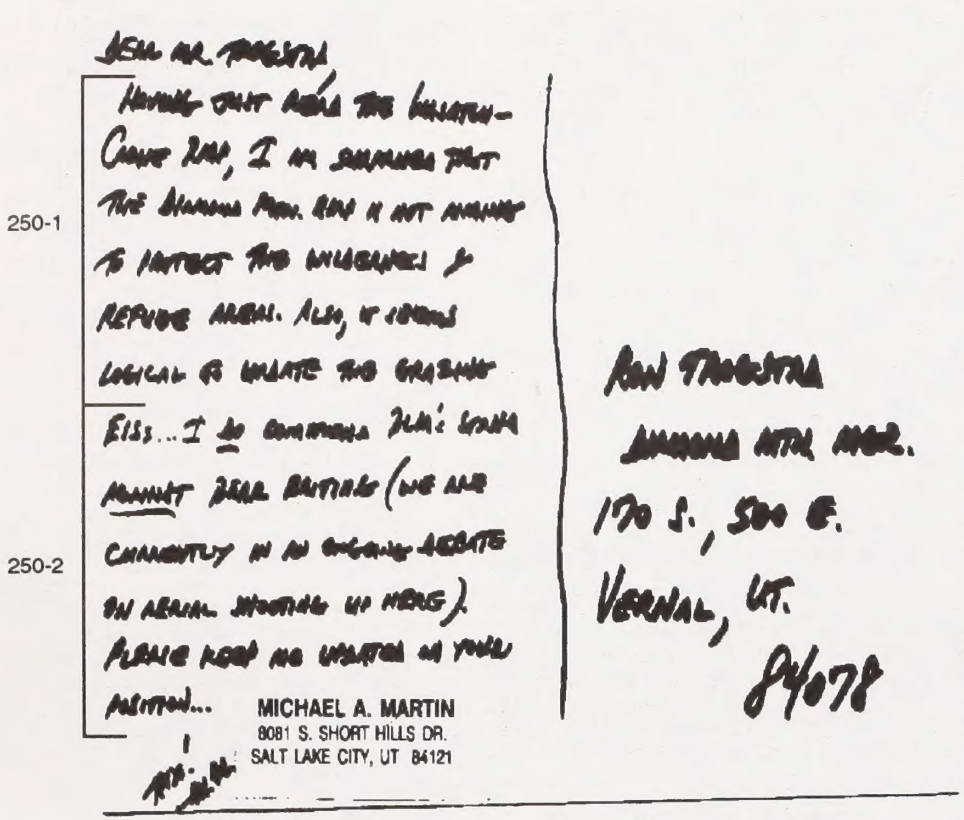
249-3 (2) Each item in the Reference Section should be made available for public review in the Office of the State Director and the Vernal District Manager. Now, some may claim that this would be impractical but, to do otherwise denies the general public full access to all the materials in the DEIS.

Sincerely,

Ronald J Younger
920 East 1500 South
Bountiful UT 84010-2138

249-2 The Glossary includes those words and phrases used commonly throughout the plan or where a precise meaning is inferred (i.e., carrying capacity). Where no definitions are provided, the commonly accepted dictionary definition is applicable.

249-3 The specific references cited in this plan are available for review at the Vernal District Office (also the office of the Diamond Mountain Resource Area).


DEAR MR. TROGSTAD,
HAVING JUST READ THE WASATCH-CACHE RMP, I AM SURPRISED THAT THE DIAMOND MOUN. RMP IS NOT NAMING TO PROTECT THE WILDERNESS & REFUGE AREAS. ALSO, IT SEEMS LOGICAL TO UPDATE THE GRAZING EISs...I DO COMMEND BLM'S STAND AGAINST BEAR BAITING (WE ARE CURRENTLY IN AN ONGOING DEBATE ON AERIAL SHOOTING UP HERE). PLEASE KEEP ME UPDATED ON YOUR POSITION...
250-1
250-2
MICHAEL A. MARTIN
8081 S. SHORT HILLS DR.
SALT LAKE CITY, UT 84121
RON TROGSTAD
DIAMOND MTN. MGR.
170 S., 500 E.
VERNAL, UT.
84078

RESPONSE TO COMMENT LETTER 250 (MARTIN)

For those that can't decipher Mr. Martin's red ink notecard:

"Dear Mr. Trogstad, Having just read the Wasatch-Cache RMP, I am surprised that the Diamond Mountain RMP is not naming to protect the wilderness and? refuge areas. Also, it seems logical to update the grazing EISs...I do commend BLM's stand against bear baiting (we are currently in an ongoing debate on aerial shooting up here). Please keep me updated on your position...thx! M.M."

250-1 Wilderness areas are discussed and analyzed separately in the Utah Wilderness EIS, published in 1990. No new wilderness areas were identified during the scoping period for this project. The RMP would apply to BLM-administered lands only, thus management of refuge areas would not be appropriate in this document.

250-2 Thank you for your comments. Please refer to our response 114-34.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

APR 2 1992

Ref: 8WM-EA

Pentelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Re: Draft - Diamond Mountain Resource Area - Resource Management Plan and Environmental Impact Statement (DEIS)

Dear Ms. Smalley,

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the DEIS for the above referenced project and offers the following concerns and comments for your consideration as you complete the final Environmental Impact Statement (FEIS).

251-1 The draft plan displays the primary emphasis of management as being livestock grazing and minerals (oil and gas) extraction. It states (page 3.57) that 10% (72,100 acres) of the area is considered highly erodible and 9% (62,750 acres) "....can contribute salt into surface waters in periods of high sediment runoff." These data and maps 3-24, 25 and 26 reflect watershed concerns that should be considered extremely important in the Diamond Mountain area. Even though erosion is considered to be a significant problem in the draft EIS, erosion mitigation appears to have an extremely low priority, as evidenced by plans to not reclaim disturbance in a timely manner (ie. Page 4.59 states "....areas may remain in an early ecological seral stage for the long-term after vegetation is cleared. Wells may produce for five to twenty years before rehabilitation efforts take place"). The Management Plan needs to be revised to place control of existing erosion as a very high priority to protect the basic resource.

251-2 EPA's primary environmental concerns are for surface water quality impacts and impacts to wetlands and riparian areas related to the proposed management practices as well as potential degradation of the quality of ground water from grazing and oil and gas activities. The draft Diamond Mountain EIS and Resource Management Plan combines wetlands and riparian areas into one classification (riparian areas), only 64% of which have been

RESPONSE TO COMMENT LETTER 251 (ENVIRONMENTAL PROTECTION AGENCY, Dodson)

251-1 In Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, under water resources, it states: Sediment and salinity production will be reduced on important watersheds and critical soils through intensive management and construction measures to reduce water degradation of the Green and Colorado Rivers. Part of this intensive management is to require oil and gas drilling operators, where needed, to construct erosion control dams on site to mitigate erosion off-site from disturbed areas. In the proposed plan it states that cumulative erosion impacts will be mitigated by range improvements and restricted OHV use. Standard stipulations for oil and gas activities on critical soils include constructing erosion control dams where designated by BLM. Producing wells and their associated access roads may not be reclaimed for up to 20 years. This is for reasons of safety (reduced fire hazard) and very heavy vehicle traffic. Once the well is officially "plugged and abandoned", the well site and access roads are reclaimed.

251-2 Of the riparian areas inventoried, 24% were found to be in an early seral stage and 55% in a mid seral stage. These figures do not equate to 79% in poor condition. The later the seral stage, the more the similarity to the potential natural community for a site. Maximum vegetation diversity occurs frequently below the potential native community, also approximately 18% of the riparian below late seral stage is due to noxious weeds which have invaded otherwise late seral stage riparian conditions. If you equate ecological status to range condition, usually early seral stages equates to poor condition and mid seral stage equates to fair condition, thus the 24% of early seral stage riparian would be in poor condition, not 79%. As stated in Chapter 3 for riparian resources, the riparian inventory continues to be an on-going process and will be completed as funding and priorities permit. As a minimum, BLM will adhere to the guidelines in the Utah State Riparian Policy as shown in Appendix 6. Refer to Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives under the riparian section for a discussion of the improvement strategies. Under Seeps/Springs in Appendix 8, under standard operating procedures for rangeland improvements, water is left at the developed spring source for wildlife purposes. When BLM develops springs, the spring area is fenced from livestock, if necessary. This practice improves riparian vegetation, and a portion of the water is piped off-site to a trough or reservoir providing new riparian and water holes.

inventoried (page 3.47). Of the areas inventoried, 79% are stated as being in poor condition. Even though the introduction to this section stresses the importance of "riparian" areas, it does not provide much emphasis toward inventory, study or correction of the problems plaguing them. A complete inventory of riparian and wetland areas as well as description of their baseline conditions needs to be completed as part of this analysis. To make the desired decisions without this information would be inappropriate. Also, EPA is opposed to the further development of natural springs due to the loss of rare, natural aquatic resources during the process. The practice should be eliminated.

251-2 Cont.

Water quality is a known problem within the basin. Enclosed are two letters from EPA Region VIII to the Utah Department of Health which address the problem and identify several drainages in the Diamond Mountain area which are not within water quality compliance standards. As you know, all federal agencies are required by Executive Order 12088 to comply with established state water quality standards. The State of Utah is scheduled to present an attainment plan addressing how it will bring these streams into compliance to EPA Region VIII by April 1, 1992. Also, the EPA is aware of the U.S. Fish and Wildlife Service's related sediment concerns for Mancos shale sedimentation and its potential effect on Threatened and Endangered species.

251-3

EPA is concerned that the DEIS does not include an analysis of the serious water quality problems that are resulting from irrigation return flows on the Ashley Creek drainage and the Pariette Wash within the Diamond Mountain RMP area. While these problems may not be the direct result of specific past BLM actions, the document fails to address the impacts, if any, or changes in BLM's actions on these watersheds that could either exacerbate or ameliorate these serious water quality conditions. In the lower Ashley Creek system, the concern is with concentrations of selenium, boron, zinc, and uranium which may originate from privately irrigated lands, the Bureau of Reclamation's Jensen Unit and the sewage treatment ponds at Ashley Valley. Without an analysis in the Diamond Mountain EIS, BLM's management of Public Lands for those grazing allotments within the Ashley Creek drainage is inadequate since it fails to assess any contribution the BLM action may have to this significant environmental problem. Within the Pariette Wash ACEC and the Wetlands Grazing Allotment, concentrations of boron are of concern. The Fish And Wildlife Service will continue its contaminant review in the area and will expand its efforts to monitor for uranium in the biota of Pariette Wash. Of particular concern are the proposed new water sources for augmenting cattle use in these two areas. Changes to springs and seeps and new reservoirs need to be assessed for their potential to release naturally occurring background concentrations of the above metals.

251-4

251-3 **NOTE--The comment dealing with an "attainment plan" has been replaced by a correction letter dated May 28, 1992, signed by Max H. Dodson, for the Director of the Water Management Division. A copy follows this letter.

Please refer to the Diamond Mountain Resource Management Plan, Management Situation Analysis, located in the Diamond Mountain Resource Area office for an in-depth analysis of specific mandates and authorities, resource allocations, and current management guidelines governing soil and water resources.

In Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives under soil and water management, it states that water is managed to comply with all federal and state laws. Under soils, management practices are designed to meet vegetation standards which will maintain or improve watershed conditions. Also as stated under the heading Water: "Watershed condition shall be maintained or improved by application of Best Management Practices using current Utah State Water Quality Standards for turbidity and total suspended solids." Water quality standards are illustrated in Appendix 9 for major water courses in the resource area with objectives to maintain or improve these areas, consistent with the State of Utah's standards. In Chapter 4 in the assumptions section under soils and water, it states: "Management actions that enhance or protect soil and water resources would be designed with measures that would preserve significant resources in the area." Also as stated: It was assumed that soil resources could be adversely affected two to three years following vegetation treatment activities (i.e., prescribed burns) until vegetation had recovered sufficiently to hold the soil in place. Until sufficient vegetation recovered on the treated site, topsoil could be transported off-site as suspended sediments and/or wind blown dust particles. This was seen as acceptable as the expected long-term benefits of improved watershed condition outweigh the short-term possible loss of the soil resource. Most of the prescribed burning takes place on closed juniper-pinyon and decadent aged sagebrush vegetation types, which are presently in poor watershed conditions.

Existing capabilities to conduct vegetation treatments with an objective to lessen erosion and increase forage production for wildlife and livestock are such that approximately 1,200 acres per year could be accomplished. Most of the treatment in the last 10 years has been prescribed burning of pinyon-juniper stands. See Appendix 8 for proposed range improvement by allotment. The BLM non-point management strategy is incorporated into BLM management plans through mitigating measures identified in project planning and NEPA review (see Chapter 2, Management Guidance Common to the Proposed Plan and the

251-5 All alternatives reflect 50,299 AUM "grazing preference" and, except for alternative B, 99% of the land area is proposed to be grazed. A comparison of tables A8-1, A8-2, A8-3 and A8-6 reveals numerous riparian and grazing problems which this plan should remedy. While the DEIS mentions that some grazing was reduced in the past, there is no mention of whether this reduction has had a favorable effect on the resources impacted or whether additional reductions or the proposed improved systems would have such an effect. The final EIS must more definitively address the realized effects of past grazing including the effects of reduced grazing implemented in the past. It must also address the specific impacts the proposed 50,299 AUM grazing preference as described in each alternative and the proposed methods, stocking levels and timeframe which would bring the range, riparian and wetland resources to satisfactory condition.

251-6 The document does not propose specific standards that the plan will require for planned activities. Baseline data and performance standards need to be an integral part of the plan to enable the reader to visualize the potential effects of management activities on the resources.

251-7 Table 2-13; Areawide Decisions by Alternative discloses that oil and gas leasing decisions are to be made with this document. EPA Region VIII developed a Scoping Comments Letter for the Forest Service's White River National Forest Oil and Gas Leasing EIS. I have enclosed a copy of that letter for your use. It attempts to address some of the key issues of importance to EPA for consideration in the oil and gas leasing EIS process. Based on our current knowledge, we believe the letter is a good summary of the types of issues that should be considered in your final EIS for oil and gas leasing.

251-8 Cumulative impacts are broadly addressed. However, for the most part, they do not represent the accumulation of site specific impacts on the environment one would expect in this type of analysis. As an example, the cumulative effects attributed to mineral and grazing activity of all alternatives consist primarily of a summary of economic impacts to the local economy due to the implementation of the subject alternative. The cumulative effects analysis should also summarize the site specific impacts of past, current and proposed projects and occurrences upon specific environmental resources, such as water quality, vegetation, wildlife, etc.

Enclosed are our Detailed Comments which address the above concerns in more detail as well as additional comments of importance. Many are concerned with lack of data, apparent inconsistencies in the analysis or indications that known problems are not addressed. The final EIS must address these concerns by providing the necessary data and analysis.

it states: "The best water quality control technology, jointly determined by BLM and the Utah Water Pollution Control Committee, will be applied as needed to meet water quality standards.

251-4 We recognize the water quality problems associated with the Ashley Valley Sewage Treatment facility, of which part is authorized under a right-of-way on BLM-administered lands. An EIS, written by the Bureau of Reclamation, is in progress to evaluate alternatives to correct the problem. Also water quality problems are of concern in the Pariette Wetlands complex. Along with monitoring water quality in the Pariette Wetlands, we are monitoring water quality and sediment loading in the upper drainages of the Pariette watershed as part of the Castle Peak Salinity Control Study initiated in 1991. Included in this study are grazing exclosures built to compare ground cover and sediment loading between grazed and ungrazed areas. Sediment and water samples are taken from reservoirs being built in the drainage. The reservoirs proposed in the Pariette and Castle Peak drainages are to trap sediment occurring from geologic erosion, to better distribute livestock, and to provide more water to wildlife; water being a limiting factor in the desert area. Please refer to Chapter 2, Management Common to the Proposed Plan and All Alternatives under water, and Chapter 3 under water quality. The State of Utah's health and wildlife agencies are aware of the public health problems associated with the Ashley sewage system and have taken every precaution possible in insuring public health, while remedial action is being considered by the interagency team consisting of USF&WS, U.S. Geological Survey, and Bureau of Reclamation representatives.

251-5 Please refer to our response 251-22, below.

251-6 It is understood that current BLM manuals outlining activity plan procedures, their implementation and evaluation standards would be followed in an subsequent activity plan tiered to this RMP.

251-7 Thank you for your information.

251-8 We have strengthened and clarified the cumulative impacts from the proposed plan and each alternative in Chapter 4.

Based on the procedures EPA uses to evaluate the environmental impacts of the proposed action and alternatives and the adequacy of the information in the DEIS, the Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement will be listed in the Federal Register in the category EO-2. This means that the review has identified significant environmental impacts that should be avoided in order to fully protect the environment and that the DEIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require substantial changes to the preferred alternative or the consideration of some other alternative. The deficiencies of data as described above make it infeasible to identify an EPA preferred alternative at this time. Because of the importance of the potential environmental impacts, I suggest that we schedule a meeting to more thoroughly discuss our concerns with this project before you begin work on the final.

Please contact either Wes Wilson (303/293-1439) or Larry Lindner (303/293-1695) of my staff if you have questions concerning these comments.

Sincerely,

Max H. Dodson, Director
Water Management Division

Enclosures: (4) Detailed Comments;
EPA letter dated Jun 2, 1989
EPA letter dated Jan 26,1990
EPA letter dated Nov 1, 1991
Utah Priority Watershed list

cc: Utah Department of Health
U. S. Fish and Wildlife Service

Detailed Comments
Diamond Mountain Resource Area
Area Management Plan and draft EIS

To alleviate the aquatic resource environmental concerns addressed in the letter, the final Resource Management Plan and Environmental Impact Statement should contain:

251-9 anticipated effects and mitigation planned for each alternative on the 304(l) streams identified in the attached EPA letters or the State of Utah action plan of April 1, 1992. This would include analysis of the Diamond Mountain area's current contribution to the problem, if any;

251-10 actions to be taken to meet state water quality standards by projects and programs to be implemented through this Management Plan and EIS;

251-11 the "Best Management Practices" or other techniques that will be required by the final Resource Management Plan to protect the aquatic resource ecosystem from the effects of the projects and programs proposed by the plan. Also, the current DEIS apparently does not require as a standard, any specific Best Management Practices to be used to control non-point source water quality impacts or impose other requirements to control sediment. Utah has adopted and EPA has approved a Non-point Source Management Plan under the Clean Water Act (CWA) Section 319 which should be used in this document as a standard to reduce potential nonpoint impacts. Similarly, the document should identify any watersheds within the Diamond Mountain area identified as priorities for NPS control efforts by the State Nonpoint Source Task Force and describe the management plan to be used for the watershed. Describe the BLM's federal consistency review process under Clean Water Act Section 319(b)(2)(f);

251-12 a discussion on how the BLM is integrating watershed activity planning and implementation with adjacent non-Public Lands;

251-13 how implementation of the Resource Management Plan will deal with potential environmental problems of noxious weed control;

251-14 how oil and gas well development, monitoring and abandonment procedures will protect surface and groundwater and air quality. Potential oil and gas development effects on surface and ground water through underground injection of surplus water and sealing procedures (cement logs) are not adequately addressed in the document. The final EIS should

251-9 Please refer to Chapters 2 and 3 for soil and water resources for an expanded discussion of water quality concerns within the resource area.

251-10 Please refer to our response 251-9. Specific BMPs that will be used to control non-point pollution are the "state of the art" practices for each resource program described in current BLM handbooks and manuals. The Pariette watershed was identified by the State of Utah's Nonpoint Source Task Force as a priority for NPS control. The nonpoint source management plan, which will be used as a standard to reduce potential nonpoint impact, is included in Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives.

251-11 Please refer to our responses 251-9 and 251-10, above.

251-12 Please refer to our responses 251-9 and 251-10, above.

251-13 As stated in Chapter 2 under vegetation, noxious weeds would be controlled under all alternatives with restrictions to protect desired ground cover and water quality. See the Diamond Mountain RMP, Management Situation Analysis, located in the Diamond Mountain Resource Area office. The noxious weed program is addressed in detail in the MSA under "Noxious Weeds or Undesired Plant Species."

251-14 The existing DMRA Management Situation Analysis, an inhouse working document, provides specifics on identification of possible contamination, specific mandates and authorities, interagency planning consistency, and inventory and monitoring information. This document is available for review at the Utah State Office and the Vernal District Office. What is required of operators during oil and gas well development and abandonment procedures (including salt water disposal) in order to protect groundwater is addressed in the following documents: The "Notice to Lessees and Operators of Federal and Indian Oil and Gas Leases Regarding the Disposal of Produced Water", also known as NTL-2B, and proposed "Onshore Oil and Gas Operations: Federal and Indian Oil and Gas Leases: Onshore Oil and Gas Orders Nos. 1 through 7 ("Disposal of Produced Water" which will replace NTL-2B. These documents are described in Appendix 4 as outlining the "minimum requirements for the permitting, drilling, and production of oil and gas wells on Federal mineral estate administered by the Bureau of Land Management.

251-14 Cont. portray processes and practices which will avoid pollution rather than prescribe a damage control procedure if an incident does occur (page A4.8). Similarly, the document states that "Produced water from oil and gas wells would continue to be disposed of by reinjection or by removal to nonfederal disposal pits" (page 2.12), but doesn't address well capacity or whether this disposal will have cumulative effects on the area's water quality, either on federal or private lands.

251-15 - Page i of the introduction states that "It is critical that the reader understand the management priority concept," however, the explanation is not adequate for the average reader to understand how the management priority concept was used to structure each alternative. The management priority concept appears to add the "management level" as a floating variable to the design of alternatives. As an example, reviewing Table 2-13 (Areawide Management Decisions by Alternative), one would anticipate that all major decisions would be apparent. Reviewing the Pariette ACEC (page 2.56) decision discloses that Alternative E is the "Same as Alternative B" which states "Designate 11,600 acres in the Pariette drainage as an ACEC." Comparing the maps for the respective alternatives, however, shows that separate "management levels" are planned with these two alternatives for the same ACEC. The statement "Same as alternative B" is therefore misleading. Due to this and other, similar concerns, this concept made our review more difficult and increased our confusion rather than being helpfull in our understanding the process or decisions made.

251-16 - The use of GIS to accurately ascertain acreage impacts by alternatives should improve the reliability of complex summary information. As discussed above, however, its ability to track complex data may tend to add complexity to the analysis and confusion for the reader.

251-17 - Sediment is identified as a major concern in the Diamond Mountain analysis area. The concept of reducing erosion by restricting OHV use to roads and trails appears legitimate and effective. However, to <u>not</u> mitigate erosion from Oil and Gas leasing by using the erosion "saved" by restricting OHV use will effectively retain the status quo rate of erosion rather than improve upon existing conditions. This seems inappropriate. In this case, a restriction on a presumably discouraged type of impact is proposed as a trade off for allowing an increase on a presumably preferred type of impact. The analysis does not identify any threshold (ie. standard) of an "acceptable" level of sediment nor does it quantify current water quality of the streams in comparison to this threshold or provide an explanation of any increases above "baseline" or why one use is better than another.

251-15 We apologize for any confusion or misunderstanding you had in understanding the decision matrices. Basically what the decision "same as Alternative B" is saying is that designation of the 11,600 acres at Pariette Wetlands as an ACEC is the same under Alternative B and the proposed plan. The assignment of resource values to a particular management level may indeed be different under the alternative and proposed plan because the overall management objectives are different. Please compare the specific management decisions for each ACEC by proposed plan or alternative in Chapter 2.

251-16 Please refer to our responses 251-1 and 251-3, above.

251-17 A trade-off between erosion saved by restricting OHV use and not mitigating erosion caused by oil and gas activities is not intended. Erosion from oil and gas activities is mitigated by erosion control procedures or restrictions as part of their leases or Applications for Permit to Drill. Although OHV use is restricted in some areas, reclamation and erosion control structures, as part of their authorized use, is not required.

251-18 - In discussing "relict vegetation"; protection from wildfire will "....have long term positive impacts on the soil, watershed and vegetation resources...."(page 4.35). When discussing grazing and grass forage production for livestock, "....One benefit derived from juniper and pinon burning is increasing diversity of herbaceous vegetation species....greater ground cover to lessen soil movement" (page 4.31). The similarity and difference between these two statements should be explained.

251-19 - The use of elk and deer as indicator species is ineffective due to the ubiquitous nature of their use of terrain as displayed in table 3-3, page 37.

251-20 - In several sections, the DEIS describes erosion potential as being a major concern. However, when the document addresses oil and gas impacts (the preferred alternative would allow mineral activity on 90% of the land area; page 2.3), it does not discuss grass seeding as a measure to reduce sedimentation until final site reclamation. The text states "Wells may produce for five to twenty years before rehabilitation efforts take place" (page 4.59). Seeding to provide protective cover is a commonly used practice to control erosion and minimize the introduction of noxious weeds during oil and gas operations.

251-21 - Much of the DEIS deals with vegetation management in pinon-juniper stands. Type conversion from pinon-juniper to grass is characterized as being beneficial to wildlife. This statement is not substantiated in the document with data. While this conversion may benefit deer and elk, it may concurrently reduce the area's total biodiversity by eliminating habitat for amphibians, reptiles and other species. The final EIS should look at mosaics with a broad (i.e. landscape) perspective to determine the cumulative effects of specific type conversion projects. Benefits and adverse effects should be determined at this scale. The analysis should fully disclose the impacts of pinon-juniper / grass conversion on biodiversity if it declares it a benefit to wildlife.

251-22 - The analysis reflects that the primary concern and emphasis for the Red Creek ACEC is sediment and streambank damage. It is therefore difficult to understand why even the Level 1 lands are designated for grazing and mining with "minimal restrictions". If this prescription is maintained in the final EIS, it should describe why all the ACEC isn't within Level 1 management (assuming the conditions are similar accross the ACEC) and why Level 1 lands don't need to be closed to use to provide an adequate level of protection.

251-23 - Grazing appears to be the most ubiquitous use of the Diamond Mountain Resource area. All alternatives reflect a 50,299 AUM grazing preference (page 2.45), although alternative B

7

251-18 The suppression of wildfires in the "relict areas" are solely to maintain the late to climax vegetation communities, not to have positive impacts on soil or watershed which fire could benefit in the long term. The first sentence on paragraph 2, second column, on p. 4.35 of the draft plan has been deleted.

251-19 Please refer to our responses 6-4 and 6-5.

251-20 In Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, under leasable minerals, it reads: "Where required, stipulations will be attached to leases to mitigate impacts to sensitive species, cultural areas, and other resources susceptible to impacts from leasing-related activities." Standard Conditions of Approval for the Surface Use Program of the Application for Permit to Drill in areas containing critical soils are: Building erosion control dams located by BLM and seeding unused, disturbed areas on the well pads or access roads no longer needed for operations.

251-21 The positive impacts of pinyon-juniper conversion are stated in the impacts to soil and water and the Vegetation resources in the Impact Analysis, Chapter 4, of the RMP. As stated, there would be long-term benefits to watershed, increased forage for livestock and wildlife, and increased vegetation diversity in mid seral stages of treated closed stands of pinyon-juniper. The references listed in the document are (Severson and Rinne, 1988) and (Wright, Neuen Schwander, Britten, 1979). Treating the maximum possible over the life of the plan, only 2.5% of the total resource area would be treated which is only about 8% of the pinyon-juniper vegetation type in the resource area. Pinyon-juniper comprises about 16% of the resource area. Historically, pinyon-juniper has encroached on adjacent grassland and sagebrush/grassland communities in the west due to fire suppression and past heavy grazing.

251-22 Much of Red Creek sedimentation and streambank damage is caused by geologic erosion, although grazing and mining would be allowed only to maintain or improve ACEC values in the proposed plan.

251-23 Livestock preference in Alternative B which read 50,299 AUMs was in error. Livestock preference has been changed to read 25,007 AUMs to reflect reductions analyzed in Chapter 4. Refer to Appendix 8, for a detailed history of forage allocation. Much of these reductions were made as mitigation for building Flaming Gorge Reservoir and Dam and for wildlife habitat enhancement. Other reductions were made from conversions from sheep to cattle and due to forage allocation problems shown by monitoring over time. Ecological condition ratings are approximate and are used as a tool for evaluating management goals. The goals of increasing forage for wildlife and insuring livestock stocking rates are not above

discusses a potential reduction in grazing (page 4.66). While Alternative B allocates 87% of the Diamond Mountain area to grazing, all other alternatives (including the preferred alternative) allocate 99% (discussion of alternatives in Chapter 2). While there is an indication in the document that grazing was reduced in the past (page 3.23), the reviewer could not find any analysis of whether this reduction has resulted in improved range condition. A summary of this information in the final EIS would ensure correct information is disclosed. A comparison of tables A8-1, A8-2, A8-3, A8-5 and A8-6 was made to try to reconstruct this information. This comparison resulted in the following information:

Forty of the 114 allotments (page 2.9 states there are 108 allotments, but, depending on the table, there are from 108 - 115 allotments listed) are carried in Management Category I, which has the objective of "To implement management actions that will improve existing resource condition and productivity and enhance overall multiple use opportunities."

There are 23 allotments listed as having riparian problems and 15 of these are also listed in Management Category I. All federal agencies, including the Bureau of Land Management, have a particularly strong mission to protect aquatic resources (i.e. riparian and wetland areas).

251-23 Cont.

There are seven allotments listed in Management Category I that contain 14.7 miles of riparian listed as being in the early seral condition.

These seven allotments have a current livestock preference of 6534 AUM's. They also have 1392 of the original 7926 AUM's suspended in three of the allotments.

Six allotments have riparian difficulties and are listed as having an unsatisfactory present management system, but have no suspended AUM's.

The priority for revising Allotment Management Plans (AMP) is not apparent. Of the 18 AMP's prioritized for revision, 9 are for wildlife and 9 are for riparian and watershed (wetland) concerns. Seventeen allotments listed with either riparian or "livestock preference exceeds vegetation production capability" have no priority for revision.

251-24 Due to the amount of rangeland potentially impacted by grazing under the preferred alternative (99% of the land area) trend information would seem to be a vital and

available forage, have been achieved through a history of reductions in use by livestock. Monitoring data is available to review at the Diamond Mountain Resource Area office.

a. Six of the allotments listed in Table A8-1 are administered by Vernal District, Diamond Mountain Resource Area, but the planning is the responsibility of Colorado BLM as stated at the bottom of the table on p. A8.10.

b. Seven of the 23 allotments having riparian problems consist of springs that need to be fenced or livestock management adjustments needed to improve the spring areas. There are many factors in combination to be considered in the allotment categorization process, refer to Appendix 8, the Allotment Categorization Process. Allotment problems can be improved even though the allotment category is not an "I". There is an on-going program using volunteers to fence spring areas requiring grazing exclusion. Contributions of labor or funds increase priority in scheduling range improvements.

c, d, e. Suspension of livestock AUMs is not always necessary to improve upland and riparian areas. Livestock can be managed using prescribed grazing conducive to maintaining or improving riparian areas. BLM will follow the guidelines of the Utah State Riparian Policy, shown in Appendix 6, until otherwise revised.

f. Eighteen allotments were prioritized for allotment management plan development. Many problems such as over use of spring riparian areas, and forage allocation problems can and are solved in many cases without AMP development.

251-24 Refer to Appendix 8. Some allotments were placed in unsatisfactory condition in error; this has been corrected. In some cases, allotments in unsatisfactory condition are designated as such due to production below potential in providing wildlife habitat. A change in livestock management, in this case, is not necessarily required for improvement (refer to the range monitoring studies). Vegetation trend, actual use/utilization, and climate information were used and will continue to be used to determine if grazing management is meeting allotment objectives. Data in the various tables in Appendix 8 will be used when setting objectives by allotment at the activity plan level.

251-24 Cont. valuable analysis tool to determine desireable levels of grazing. Considerable data are available in the various tables, however, the reviewer could not determine how they were used to develop future management options or to develop the alternatives. For instance, it would seem that there should be a correlation between range currently in unsatisfactory condition with unsatisfactory present management and the priority list for new or revised allotment management plans. While there is some similarity, there does not seem to be a direct correlation.

251-25 The last boxes of Table 2-13 on page 2.46 show that the number of allotments under the "I" management category is 39 for alternative A and 52 for all other alternatives. Does this reflect an increase in management emphasis from the current situation for all action alternatives or does it reflect a degradation of the resource requiring additional management emphasis to obtain improved management? If it is the latter, it would be considered an adverse effect for those alternatives. The context in which Management Level I is used in Table A8.37 (and page 2.9) seems to indicate the term is reflective of range condition being less than it could/should be (i.e. "present ecological condition is unsatisfactory") and that "I" allotments are managed "to improve unsatisfactory conditions."

251-26 The analysis states the overall objective is "to achieve an advanced (late seral) ecological status" and, specifically, "....to achieve 75% or more of the riparian ecosystems are in late seral or potential natural stage by 2007" (page 2.11). To accomplish this objective within the stated 15 years, the final EIS should establish an action plan or other guidance. It would also be appropriate to describe where the BLM's "bring back the natives" program will be implemented.

251-27 - The document uses $9.19 (page 4.23) as the value of forage consumed per AUM. There is no reference as to the origin of this value. Current BLM charge is $1.92 per AUM. The economics of government investment in the Diamond Mountain Resource Management Area is not disclosed. This EIS is not an appropriate forum to deal with the national debate over grazing fees, however, the public investment and anticipated return on that investment is an important consideration for the final decision for the management of this unique area. Costs for improving cattle grazing and ecosystem management should be displayed for comparative purposes. The benefits of multiple use management, using the existing grazing fee and oil and gas leasing structure, should be similarly displayed in order to provide an economic basis for consideration in the selection of the preferred alternative and specific projects.

251-28 - While the cumulative effects analyses describe the potential loss to government receipts for precluded wells under

251-25 The increase in "I" allotments on Table 2-19 for livestock under the proposed plan is due primarily for the potential for wildlife habitat and riparian improvement. To reach potential, various management practices are proposed in each alternative including rangeland improvements, grazing prescriptions, and livestock reductions. This does reflect an increase in management emphasis from the current situation except in Alternative B which would accomplish goals primarily through livestock reductions and other restrictions.

251-26 Riparian areas are prioritized for improvement in Appendix 8, on Table A8-2.

251-27 Please refer to our comment 104-2. It is BLM policy to conduct a benefit/cost analysis before project investment takes place. The modified socioeconomics section in Chapter 4 presents an estimated benefit/cost analysis for the proposed plan and each alternative.

251-28 We believe the cumulative impact section for the proposed plan and each alternative as presented in this document adequately quantifies the environmental effects.

251-28 Cont. various alternatives, they do not describe the specific (some general discussion) environmental effects in terms of sediment, sage grouse populations, etc.

251-29 - Page 2.17 of the decision summary states the middle and lower sections of the Green River "would be managed so as not to jeopardize their Wild and Scenic River Qualities". However, they are placed in Management Level 3 where "activities can be constrained somewhat." Is this the correct level for the protection needed?

251-30 - Page 2.36 - In the third block under Alternative A, says there are 2,800 acres in level 3. Page 2.16 shows this as level 2. Also, Block 4 under Alternative B shows "173,000 acres in level 3 lands." Page 2.21 shows 155,700 acres.

-Page 4.66 - Alternative E displays the livestock forage assignment as 50,200 instead of 50,299 AUM.

251-29 Under Alternative A, continuation of the current management, level 3 for the middle and lower segments of the Green River is consistent with the overall management objective for the alternative. We believe this management level is consistent with the general management theme for this alternative.

251-30 These corrections have been made.

NOTE: For brevity only the supporting documents referred to in EPA's letter are not duplicated in this document. They are available for public review in the Vernal District Office.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

MAY 2 8 1996

Ref: 8WM-HA

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Re: Correction--Comments on Diamond Mountain Resource Area - Resource Management Plan and Environmental Impact Statement (DEIS)

Dear Ms. Smalley:

We would like to make a correction to comments made in our letter to you dated April 2, 1992 pertaining to the DEIS for Diamond Mountain. Please note on page 2 of our comment letter, in the first full paragraph, we mentioned an "attainment plan" which was being developed by the State of Utah to address waters not in compliance with water quality standards. We were in error in referring to an attainment plan--such a plan is not being developed by the State, neither are they under any requirement to develop such a plan at this time.

There is a requirement for the State to identify waters where planning is needed to correct water quality problems. Such a list of waters is discussed as a requirement in Section 303(d) of the Clean Water Act where "total maximum daily loads" (TMDLs) are to be identified for problem waters. This list of waters in need of TMDLs will be available from the State over the next month.

We apologize for the confusion. Please contact either Wes Wilson (303/293-1439) or Larry Lindner (303/293-1695) of my staff if you have questions concerning this matter.

Sincerely,

Max H. Dodson, Director
Water Management Division

cc: Utah Department of Health
U.S. Fish and Wildlife Service

UINTAH BASIN ARCHEOLOGY CLUB
+ THORN STUDIO
18 WEST MAIN STREET
VERNAL UTAH 84078

TO: Bureau of Land Management
170 S 500 E
Vernal Utah 84078

March 29, 1992

Diamond Mountain Resource Management Team

After review the the Draft Diamond Mountain Resource Management Plan, we have some concerns with the proposed preferred alternative in regard to the management of the Red Mountain/Dry Fork ACEC complex.

The first concern involves the leasing of lands for phosphate and potential development. This is inconsistent and in conflict with management of the critical resource values identified that gave this area special recognition.

As you know, the Uintah Basin Archeology Club was a co-signer on the original ACEC designation for the Dry Fork/Red Mountain ACEC complex, at that time called the South Face Footslopes of the Uintah Mountains. We felt there was cause for concern to critical resource values and the ACEC criteria was met affect the following values: 252-1

1. Significant Recreation Values
2. Significant biological diversity
3. Significant archeological sites and traditional cultural values
4. Significant wildlife habitat - critical crucial winter range for deer and elk, and numerous habits for other wildlife species
5. Outstanding scenic vistas
6. Significant historic sties and values
7. Geologically significant diverse rock formations
8. Unique underground aquifer system that supplies Vernal City with culinary water
9 Ranching

We further stated that the primary intent of this ACEC is to protect and preserve the resource values and life style of Ashley Valley Residents and those resources of Critical Environment Concern. A variety of multiple-use activities may take place within this ACEC. These activities, however, must be compatible with the primary management objective of this ACEC, which is to protect and prevent irreparable damage to important historic, cultural, scenic and recreation values, livestock grazing, fish and wildlife resources, and all those special values listed above. Mineral leasing of Phosphate is incompatible and need to be withdrawn for the management focus of ACEC designation with those identified values being paramount to the future of the Basin and the quality of

RESPONSE TO COMMENT LETTER 252 (UINTAH BASIN ARCHEOLOGY CLUB, Mantle)

252-1 Please refer to our response 112-1.

252-2 In supporting the economic and cultural lifestyle of the ranching community, we also have some concerns with the proposed reductions of livestock grazing. Part of our reason for the designation of the ACEC was to preserve the resource values and life style of the Ashley Valley Residents and those resources of Critical Environmental Concern. Recognition in preserving this lifestyle needs to be a part of this decision. Proper management practices need to be implemented to protect the riparian, soil, and water resources. Not reductions in livestock numbers.

252-3 We also have problems with acquiring additional public vehicle access that would open 70,700 acres of presently inaccessible land, and could result in wildlife displacement from their preferred habitat within these areas. The opening of these land would also place additional pressure on cultural sites, thus resulting in increased damage. Your impact summary p. 4.69 states that under the preferred alternative "designation of all special emphasis areas as ACECs would increase the recreation management emphasis in these areas, thus providing protection and enhancement of those resources valued by the recreating public preferring more primitive recreational experiences" Recreation management may be viewed as also consisting of constraints from increased recreation use, and not necessarily the promotion of use within an area. Recreation use is increasing in this area, thus requiring a more careful and intensive management emphasis to protect all the values of the area. The opening of presently inaccessible land is in conflict with the intent of the ACEC designation. Recreation is only mix of the multitude of resource values and needs constraint to protect other values.

252-4 Page 4.64 under impact summary shows "accidental disturbance to both cultural and paleontological resource would continue due to surface-disturbing activities." This is unacceptable. National laws and regulations require the protection of these sites. Determination of significance needs to be established before any ground disturbing activities takes place. Accidental disturbance from management in unacceptable. After a careful analysis of the site, and significance determination, the decision to go ahead with a project would not result in accidental disturbance, but a management decision based on significance and the proposed project.

Special recognition of the Ute and traditional uses of the land within the ACEC is commendable. However, in order to protect these uses, and to have the recognition mean anything, all management of the area needs to recognize the impact from conflicting uses. This ties back to the mineral leasing decision for phosphate. You cannot manage for all the critical resource values of the area identified, and yet allow phosphate development to occur; Piller, post, or whatever. These are conflicting uses that cannot be resolved without a deteriorating quality of lifestyle to the Uintah Basin. Benefits from phosphate development could never replace the resource values lost to the future of the Basin.

252-2 We agree that proper management practices need to be implemented to meet resource goals. The proposed plan is to establish livestock preference at existing levels (50,299 AUMs, refer to Table 2-15) Also refer to Table 2-15 under vegetation for a description of forage adjustment criteria/procedures. If indicated by analysis of monitoring data, livestock reductions would be made only after all management options have been exhausted.

252-3 Please refer to our response 13-1. We have identified access needs for foot and vehicle travel. This was an attempt to be sensitive to both wildlife and private land owner needs. We have identified 43,200 acres in the resource area that will remain accessible only by foot travel.

252-4 A cultural clearance will be completed on all areas before surface disturbing activities take place and on all areas identified as having high paleontological potential. However at times these resources can not be detected on the surface and are only discovered after a project has begun. We will do everything we can to keep this problem to a minimum.

252-5 We look forward to working with you in the development of the ACEC plan for the Red Mountain/Dry Fork Complex. However, there needs to be a well developed management scenario for this area that clearly spells out the management philosophy, and eliminates incompatible uses: i.e. Phosphate Mineral Leasing and development. These lands need to be withdrawn for the designation and plan for the area to have any meaning.

Thank you for the opportunity to comment on this draft. Please see the attached copy of the ACEC proposal we were involved with in 1988.

Sue Mantle

Sue Mantle
President
Uintah Basin Archeology Club

252-5 Thank you for your support.

NOTE: For brevity only the supporting documents referred to in UBAC's letter are not duplicated in this document. They are available for public review in the Vernal District Office.

CELSIUS ENERGY COMPANY

79 SOUTH STATE STREET • P. O. BOX 11070 • SALT LAKE CITY, UTAH 84147 • PHONE (801) 530-2600

April 1, 1992

Jean Sinclair
RMP/EIS Team Leader
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Ms. Sinclair:

Re: Draft Resource Management Plan and Environmental Impact Statement for the Diamond Mountain Resource Area

Celsius Energy Company is an oil and gas exploration and production company that operates in the Rocky Mountain Region. As such, Celsius is concerned about the Bureau of Land Management's Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Diamond Mountain Resource Area. The Diamond Mountain Resource Area in northeastern Utah currently provides a significant portion of the oil and gas production in the State of Utah and any additional constraints on oil and gas development should be carefully scrutinized.

While Celsius recognizes that the Bureau of Land Management (BLM) must balance competing uses of federal lands, the agency must adequately justify its actions in favoring one use over another. For instance, in the Draft Diamond Mountain RMP/EIS the BLM
253-1 has failed to substantiate the need for increased seasonal restrictions on oil and gas operations. Further, the agency should show that it has chosen the least restrictive alternative to protect the wildlife habitat. Because Alternative E of the Draft RMP/EIS, identified as the Preferred Alternative by the Agency, increases seasonal stipulations, the document should describe the effect of overlapping restrictions. Finally, the BLM has not adequately identified what the Agency considers to be the "adverse impacts" of oil and gas activities.
253-2 The National Environmental Policy Act requires that potential adverse effects be identified and analyzed along with mitigation measures, if any, which may alter the impact of oil and gas activities.

RESPONSE TO COMMENT LETTER 253 (CELSIUS ENERGY COMPANY, Jepperson)

253-1 We have amended several portions of the wildlife section, clarifying the need for the management actions and decisions proposed. In several proposed decisions, the restrictions have been lessened, due largely to public comments, refer to our response 212-2.

253-2 Please refer to Chapter 4 for an analysis of the impacts of energy development as it relates to other resources. We believe the analysis provided in this document adequately identifies and analyzes the potential effects, along with mitigation measures, of oil and gas activities on other resources.

Thank you for your consideration of Celsius' comments on the Draft Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement.

Very truly yours,

Thomas C. Jepperson
Managing Attorney

pf

cc: RMOGA
J. B. Neese

March 31, 1992

Diamond Mountain Draft Resource Management Plan/EIS
Diamond Mountain Resource Area

Jean Sinclair
RMP/EIS Team Leader
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Ms. Sinclair:

Texaco Exploration and Production Inc. ("Texaco") has reviewed the Diamond Mountain Draft Resource Management Plan and Environmental Impact Statement (EIS). We offer the following comments:

255-1 • BLM's "Preferred Alternative" (Alternative E), proposes to increase Timing and Controlled Surface Use (CSU) Stipulations by over 200% in Special Emphasis Areas with high oil and gas potential. We find little discussion to justify or provide rationale for these dramatic increases in wildlife seasonal restrictions. Nor is there documentation in either Chapter 3 (Affected Environment) or Chapter 4 (Environmental Consequences) indicating oil and gas activities cause population decreases or other adverse impacts to wildlife.

255-2 • BLM proposes to increase No Surface Occupancy (NSO) acres by 62% in Alternative E for areas with moderate to high oil and gas potential. Where is the justification and rationale for such an increase? In areas with significant potential BLM should explore reasonable mitigation approaches wherever possible, rather than closing off areas to oil and gas exploration.

255-3 • Texaco prefers Alternative D which appears to have the least amount of Timing and CSU restrictions yet adequately addresses environmental concerns. Even this alternative reflects a significant increase in Timing restrictions, but does drop the number of NSO acres in the current management alternative (Alternative A). As a second choice, we recommend adoption of Alternative E.

255-4 • The one area of serious concern to Texaco is the Red Creek Watershed in the Clay Basin-Manilla Area. Already designated as an Area of Critical Environmental Concern (ACEC), this 24,400 acre parcel includes Clay Basin field (now gas storage) as well as potentially prospective areas along the north flank of the Uinta uplift. Severe restrictions might impede development of valuable petroleum resources in the area.

Texaco appreciates the opportunity to comment. Please contact Mr. T. M. Belton if you need further information.

Very truly yours,

E. C. Burritt
Rockies Area Manager

RESPONSE TO COMMENT LETTER 255 (TEXACO, USA, Burritt)

255-1 Please refer to our responses 252-1 and 212-2.

255-2 Please refer to Table 2-15 in this document. You will notice that certain decisions in the proposed plan have been modified to account for mitigation measures and/or increase management flexibility. Please refer to Chapter 3 for information and rationale that lay the ground work for NSO stipulations for certain resource values.

255-3 Thank you for your comment.

255-4 In the proposed plan, approximately 2,500 public acres of the Red Creek Watershed ACEC would be Category 3, open to leasing with no surface occupancy or other major constraints. No public lands within the ACEC would be Category 4, closed to leasing. Based on our analysis, such a designation would preclude approximately .4 of a well on public lands.

Ron Trogstad, Area Manager
Diamond Mountain Resource Area
170 South 500 East
Vernal, Utah 84078

March 29, 1992

Dear Mr. Trogstad:

256-1 I understand BLM has proposed that alternative E of the draft Diamond Mountain EIS and RMP be selected as the best management scheme for the area. Having reviewed the options for management, I recommend otherwise. Alternative B offers much better protection for important archeological resources like Nine Mile, the Browns Park ACECs (which need strong protections) and a vigorous study plan for wild and scenic river designation on the Green.

I support the ban on mineral leasing for sensitive lands that would be better managed without such extractive use and the closure of all riparian areas to ORV use. Just because these machines exist does not warrant their uncontrolled use on public lands of such aesthetic and important wildlife values.

256-2 Alternatives B and E are commendable in that both recommend against bear baiting, a repugnant method of chumming wild bears that has no place in modern hunting. They are commendable in that the endangered ferret would be reintroduced, however the prohibition of livestock in the protected area is too limited in E. Here alternative B is superior, as it is in safeguarding critical winter range for ungulates.

Please enact the strongest protective measures for the Diamond Mountain Resource Area. There are too few chances to do the right thing by such invaluable land.

I'd appreciate your keeping me up to date on this planning effort and entering this letter in the public record. Thank you.

Sincerely,

Margaret Pettis

Margaret Pettis
190 South 100 West
Hurum, Utah 84319

RESPONSE TO COMMENT LETTER 256 (PETTIS)

256-1 Please refer to our response 61-1 regarding the need for additional highly restricted public lands.

256-2 Thank you for your support, however, please refer to our responses 114-34 and 116-9 regarding bear baiting for clarification on this issue.

Dinaland Snowmobile Club
P. O. Box 1150
Vernal, Utah 84078

April 4, 1992

Study Team:
Diamond Mountain Resource
B.L.M.
170 South 500 East
Vernal, Utah 84078

Dear Team:

Recently I mentioned a need to address snowmobiles specifically in any future management plan. Most all other OHVs are addressed and do fit the general category of OHVs - ORVs. But by themselves, snowmobiles are entirely different and I would hope are not "lumped" into the same category with all others (the same as horses are not lumped in with OHVs).

I note you list mountain biking as being a different classification, but not snowmobiling.

257-1 I'm sure you know that snowmobiles do not ride on nor destroy the ground; that snowmobiles in our area ride above the 8,000 foot level most of the time and do not bother game animals; that their activity takes them to elevations of 12,000 feet; that they are isolated users of vast untrammeled areas and thus don't interfer with most all other winter activities - users of the out-of-doors.

I realize that comment period is over for the Diamond Mountain -- Red Mountain, etc. areas, but want to re-enforce many facts about snowmobiles that usually seem not to come to mind when planning is involved.

thank you.

Sincerely yours,

Don Hatch

Don Hatch
Executive Director

RESPONSE TO COMMENT LETTER 257 (HATCH)

257-1 Thank you for your information.

BLUE RIBBON COALITION INC.
"Preserving our natural resources FOR the public instead of FROM the public"
P.O. BOX 1427 • IDAHO FALLS, IDAHO 83403-1427 • (208) 522-7339

April 1, 1992

Penelope Smalley, Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Re: Draft Diamond Mountain Resource Area RMP/EIS: BlueRibbon Coalition Comments

Dear Ms. Smalley:

The BlueRibbon Coalition is a nationwide organization representing 500,000 motorized recreationists and resource users. We work with land managers to provide recreation opportunities, preserve resources, and promote cooperation with other public land users. We have many members and member organizations who recreate and use the resources on the Diamond Mountain Resource Area, and are profoundly affected by the proposed management described in Draft Diamond Mountain Resource Area RMP/EIS (Draft Plan).

As Public Lands Director, I have carefully evaluated the Draft Plan. Following are my comments:

258-1 1. The Draft Plan "Purpose and Need" states a goal of "provide opportunity for OHV users" consistent with other resource objectives (page 1.11). Yet in the Recreation Management section of "Common Management" (which describes management common to all alternatives), many important kinds of OHV recreation are omitted from the list (page 2.10), while a full range of non-motorized activities are cited. Correct this list to include: trail motorcycling, dual-purpose motorcycling, all-terrain vehicle riding, and four wheel driving.

258-2 Recreation Management also states in this section that only non-motorized activities will take place in semi-primitive non-motorized areas. These areas must be carefully evaluated to assure that historic motorized recreation is not displaced, nor access through to other areas denied. Some management plans (such as the Challis and Payette National Forest Plans) allow designated route corridors through semi-primitive non-motorized areas, when needed to access adjoining motorized areas. Please consider this modification.

258-3 2. The Decision Summary for Alternative E paints a rosy picture of continued access for OHV recreation (page 2.31). In this alternative (the Selected Alternative), only 6 percent of the resource area would be closed. However, this summary fails to mention current and historic OHV use. In fact, the rest of the document outlines restrictions and closures on the most popular OHV recreation areas. This summary's assessment of OHV recreation

RESPONSE TO LETTER 258 (BLUE RIBBON COALITION, Cook)

258-1 The phrase "recreation 4-wheeling" has been changed to read "recreation OHV use". Please refer to the Glossary for further clarification.

258-2 Please refer to Appendix 5 for an explanation of what conditions must be present for an area to be designated as a semi-primitive nonmotorized area.

258-3 The discussion about OHV use on page 2.31 of the draft has been modified.

258-4 The Decision Summary on the same page, and in many other parts of the Draft Plan, cites "surface disturbing activities and OHV use" and proceeds to outline restrictions. The other surface disturbing activities are never specified. The Draft Plan must recognize that all recreational and resource using activities (specifically non-motorized) at sensitive times and places are indeed surface disturbing and subject to closure or restriction.

258-5 3. Table 2-13, Page 2.50 describes Areawide Management Decisions by Alternative for OHV Recreation. Alternatives A, B, and E single out OHV recreation for restrictions in black-footed ferret introduction areas. No documentation is presented that describes how OHV use would affect the black-footed ferret.

Table 2-13, Page 2.46 describes Areawide Management Decisions by Alternative for Livestock. There is no mention of grazing impacts or restrictions in black-footed ferret introduction areas. Certainly, grazing would potentially impact these areas as much as OHV recreation. Again, no documentation is presented to describe if or what impacts grazing would have.

There is a gross inconsistency in the Draft Plan regarding the management of black footed ferret introduction areas.

258-6 4. Table 2-13, Page 2.52, Alternatives B and E contain the following biased statement, "Maintain the character and values of (xxx) acres of identified semi-primitive non-motorized areas (maps referenced) by closing the areas to OHV use and monitoring surface disturbing activities."

This statement implies that the character and values of an area are adversely impacted by OHV recreation. OHV recreationists appreciate the wild, rugged, undisturbed character of an area and the solitude that dispersed recreation provides. In addition, they appreciate the challenge of riding a trail, unique to their OHV. An OHV may or may not impact the surface as much as any other activity.

The equation of "solitude" to the absence of vehicles and vehicular noise is subjective. Unfortunately, this subjective opinion has been foisted upon land managers by exclusionary special interest groups.

258-7 5. Table 2-14 describes management prescriptions for special emphasis areas by alternative. Alternative A supposedly describes the current management situation. Yet on page 2.71, the description for recreation on Red Mountain implies there is only one motorized trail on Red Mountain. The area is currently open and unrestricted, and the alternative should clearly state this.

258-8 6. The selected alternative's management prescription for OHV use on Red Mountain fails to recognize the importance of this recreation to the historic use of the area, or the local cultural values that have developed through this pattern of access. The alternative has failed to demonstrate a purpose or need for non-motorized trails in the area or exclusive trails for mountain bicycles.

258-4 OHV use is not considered to be a surface disturbing activity in this document. That is why the phrase "surface disturbing activities and OHV use" are often found together in the document. Recreation uses other than OHV are at times limited to protect other resource values if impacts are considered to be significant.

258-5 We discussed domestic livestock and associated impacts to black-footed ferrets and felt there were no significant impacts. We believe grazing is a compatible use with the maintenance of prairie dog colonies, by reducing vegetation and keeping areas open for prairie dog use. Most of the potential black-footed ferret habitat is also located on livestock winter range where grazing impacts to soils and vegetation are minimal. Please refer to Appendix 2 for a presentation of the draft management guidelines for black-footed ferret habitat. These guidelines apply to all potential habitat identified. The "gross inconsistencies" you refer to are the amount of acreage proposed under each alternative. These figures represent what would be managed under each alternative.

258-6 The intent is to maintain the area in a semi-primitive nonmotorized condition. These areas have been established for nonmotorized types of recreation. There are many other similar areas in the resource area that can be accessed and enjoyed by OHV recreationists.

258-7 You are correct in stating that there is more than one trail on Red Mountain. The intent of the statement on page 2.71 of the draft was to formalize the existence of that particular trail. It passes through a relict vegetation area that is proposed for limited OHV use.

258-8 Please refer to our response 10-1.

258-9 7. Although Page 3.34 specifies the estimated amount of OHV use as 31,400 hours, it fails to identify the areas most important to OHV recreation. It does state that, "Presently OHV use on public lands is concentrated near populated areas." Since Red Mountain fits that description, the restrictions proposed will seriously impact OHV opportunity, contrary to the Plan's goals to provide for that opportunity.

In summary, the Draft Plan fails to:

Assess the needs of OHV recreation, in both quantity and quality.

Recognize the importance of OHV recreation to the local community, the local economy, or its importance to visitors.

Recognize the historic use on Red Mountain.

Quantify any impacts of OHV recreation on Red Mountain to justify the proposed restrictions.

Address OHV recreation in an unbiased manner.

Please revise the draft to address these errors and discrepancies. We especially urge that Red Mountain be managed as it is currently: with open and unrestricted access for OHV recreation. Please keep me informed on the progress of your revisions.

Sincerely,

Adena Cook

Adena Cook, Public Lands Director

CC: Randy Beers, Vernal Sports Center
Alice Lemons, Dinaland Snowmobile Club
Don Hatch, Hatch River Expeditions
Rainer Huck, Utah Trail Machine Assn.
Ted Hatch
Dr. Dale C. Larsen

258-9 The 31,400-hour figure does take into account Red Mountain, the Buckskin Hills and other important OHV use areas. We are not proposing to eliminate OHV use on Red Mountain, but control it in some areas to lessen conflicts with other uses. The proposed limitation to designated roads on the southern portion of Red Mountain, known as "the Sand Pockets", was made to protect crucial deer and elk wintering areas was modified to allow unrestricted OHV use in the area a month earlier in the spring. This was done to accommodate OHV users beginning April 1 each year.

Claire M. Moseley, Manager
Federal Land Planning

1350 Lincoln Street, Suite 404 • Denver, Colorado 80295
Telephone 303/860-0099
FAX 303/860-0310

April 1, 1992

Ms. Jean Sinclair
RMP/EIS Team Leader
Diamond Mountain Resource Area
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Ms. Sinclair:

259-1 On behalf of the Rocky Mountain Oil and Gas Association (RMOGA) and Utah Petroleum Association (UPA), a division of RMOGA, following are comments on the Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) for the Diamond Mountain Resource Area. RMOGA is a trade association with hundreds of members who account for more than 90 percent of the oil and gas exploration, development and transportation activities in the Rocky Mountain West. As such, RMOGA is extremely concerned with the changes in management of the Diamond Mountain Resource Area proposed by the BLM in the Preferred Alternative E. We are dismayed that the BLM would even consider implementing a plan which would impose a 152% increase in seasonal restrictions and a 159% increase in no surface occupancy stipulations in an area which has demonstrated reserves for oil and gas resources.

We are particularly concerned regarding BLM's proposals to:

- Increase seasonal stipulations in sage grouse nesting habitat by one month from April 1 to June 30 to March 1 to June 30 and the NSO protection zone from 1.5 miles on 57,000 acres to 2 miles on 88,500 acres. (This at a time when many land managers are looking at reducing restrictions in sage grouse areas because they see such an adaptable species and are in no danger of extinction.)

RESPONSE TO COMMENT LETTER 259 (ROCKY MOUNTAIN OIL AND GAS ASSOCIATION, Moseley)

259-1 We agree that additional documentation is needed. We have rewritten portions of Chapter 3's wildlife section to document such a need. Please refer to our response 212-2, which identified those recommendations in the proposed plan which are less restrictive than current management.

April 1, 1992

Ms. Jean Sinclair
RMP/EIS Team Leader
Diamond Mountain Resource Area

Page 2

- Increase seasonal restrictions around raptor nests by six weeks from February 15 to June 15 to Feb. 1 to July 15 and the NSO protection zone would be increased from .25 mile on 5,500 acres to .50 mile on 19,400 acres.

- Increase seasonal restrictions by six weeks from April 1 to July 15 to February 1 to August 31 and the protection zone has been increased from .25 mile to 1 mile of active peregrine falcons nests.

259-1 Cont. Neither justification nor rationale is furnished in the Draft EIS/RMP to support such dramatic increases in highly restrictive seasonal stipulations in wildlife areas nor for expanding protection zones for raptors or sage grouse leks and nesting areas. The discussion of the *Affected Environment* in Chapter 3 does not contain documentation which shows that current management of oil and gas leasing and operations has resulted in wildlife population decreases or other impacts which would warrant an increase in restrictions. Moreover, the discussion of *Environmental Consequences* in Chapter 4 has clearly failed to document the need for additional wildlife restrictions. The lack of a scientific basis for increased wildlife restrictions constitutes a decisive flaw in the planning document and analysis. In view of the complete lack of data to support these changes, we recommend the BLM consider easing restrictions in favor of reasonable mitigation requirements or, at a maximum, continue its current management in these areas.

It is also problematic that BLM has failed to quantify how the overlap of new seasonal restrictions will impact opportunities to explore for and develop oil and gas resources. According to the DEIS, 36% of the high potential lands are subject to overlapping seasonal restrictions. However, it is virtually impossible to tell from the maps or tables included with the EIS/RMP the extent of these overlapping restrictions and their cumulative impacts on exploration and development opportunities. After several years of analysis, the BLM should be able to quantify this effect and display it adequately on maps.

259-2 We are compelled to point out that it remains BLM policy to utilize the least restrictive stipulation available that will adequately protect the resource or value in question. Hence, BLM must clearly disclose why current management has been deemed inadequate and how it has caused significant deterioration of resource values along with how the increase in stipulations will solve these problems. Only through such disclosure will the BLM clearly show the need for such an enormous increase in restrictions.

While we ardently support the management policy stated on page 2.35 that "*[t]hese restrictions would not apply if animals are not present or if impacts could be mitigated otherwise*", we are alarmed by the elimination of the current policy that seasonal restrictions do

259-2 In the revised text for Chapter 3, documentation has been provided supporting the premise that special status raptor species habitat has been lost due to surface disturbing activities. The yearlong protection of these nest sites is required by the Endangered Species Act, the Bald Eagle Protection Act (which involves golden eagles), and BLM policy (outlined in BLM Manual 6840). The protection stipulations have been modified to read: "These restrictions would not apply to the maintenance and operation of existing programs and facilities."

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259-2 Cont. of certain raptor nests. Instead, BLM has replaced it with, "*[s]afeguard protection zone year-round from permanent loss of nest site usability due to disturbance from daily activity or routine operations*". While industry obviously does not want to intrude upon nesting raptors or destroy active nesting sites, the BLM must also recognize industry's need to maintain and operate existing programs and facilities regardless of their location. To ignore these requirements would put not only the oil and gas industry, but also the federal government, at significant risk of liability for damages or accidents which would undoubtedly occur as a result of non-management of operations.

259-3 We object to BLM's presumption that oil and gas activities will result in unacceptable impacts on the resource values found in sensitive areas. The National Environmental Policy Act, as well as recognized planning procedures, requires that potential effects be identified, quantified and analyzed along with sound mitigation measures which may render a project and its potential effects acceptable. In our view, the DEIS/RMP has failed to adequately comply with this requirement.

For example, the general assumptions described in Chapter 4 do not address the fact that a major portion of the initial disturbance resulting from well pad and road construction is temporary in nature. If a well is found to be dry, it will be entirely reclaimed in accordance with BLM's requirements. If a well is successful and goes into production, a significant portion of the initial exploratory well location and other disturbed areas will also be reclaimed so that only a very small intrusion is left at the end of the access road, which may be closed to public use. BLM implies that once disturbance occurs, it will remain forever. All general assumptions must consider the implications of total or partial reclamation, particularly in conducting a cumulative impacts analysis.

259-4 The BLM indicates in the DEIS/RMP that geophysical exploration would continue apace with the oil and gas development scenarios. However, it is unclear why such activities would be more severely restricted than oil and gas leasing. According to Table 2-13, the BLM intends to restrict geophysical exploration more widely and with additional constraints. Since geophysical activities are subject to a rigorous permitting process and result in very minor, if any at all, impacts, it is our opinion that the entire Resource Area should be open to such activities. However, it is especially important that all high potential lands be kept open. It is unreasonable to close 14,460 acres of high potential lands from geophysical exploration when there are many non-disturbing methods for collecting geophysical data which are capable of maintaining the integrity of sensitive areas.

259-5 We also strongly object to the imposition of no surface occupancy stipulations on 60,776 acres ostensibly to preserve semi-primitive recreation opportunities. It is especially troublesome that the BLM proposes to restrict access to 2,000 acres of high potential lands. It is our belief

259-3 In desert regions with less than 8 inches a year precipitation, disturbed sites are difficult to revegetate and in some cases reclamation is unsuccessful, thus accelerating erosion over the life of a well. However, rangeland improvements would mitigate these impacts. Refer to Chapter 4, Cumulative Impacts of the Proposed Plan.

259-4 The statement under Alternative E and Alternative B in Table 4-18 of the draft document were incorrect. Under the proposed plan no lands within the Diamond Mountain Resource Management Plan would be closed to all geophysical exploration. However, some areas would be precluded from significant surface disturbing geophysical exploration (such as vibroseis) to protect critical resource values.

259-5 The plan proposes to protect 43,200 acres of lands currently classified as semi-primitive, nonmotorized. This would involve imposing a no surface occupancy stipulation on these lands. Approximately 1,100 acres on the north side of Home Mountain in Clay Basin and 900 acres adjacent to the Green River, north of Sand Wash, are classified as having high potential for oil and gas development. Appendix 5 provides a good explanation of the conditions that must be present on a tract of land to make it eligible for classification as a semi-primitive nonmotorized area. It is BLM's responsibility to provide a wide range of recreational opportunities on public lands for use by a wide variety of users.

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259-5 Cont. that existing rules and regulations provide adequate levels of protection to areas considered to have high value for recreation. Through state-of-the-art technology and environmentally sound management practices, the oil and gas industry has demonstrated repeatedly its ability to operate in sensitive recreation areas with minimal effects on other resource values. A perfect case in point in the Petroleum Showcase on the Wasatch-Cache National Forest just north of the Diamond Mountain Resource Area.

259-6 Another item of concern relates to the proposed management of the Upper Green River, the Green River in Browns Park, and along the Lower Green River, between Ouray, Utah, and the Uintah-Carbon County line. None of these rivers are being recommended by BLM for "wild" designation under Alternative E. Rather, they are being proposed for recreational or scenic classifications. Yet, the BLM is proposing to impose management restrictions which exceed those required for Congressionally designated wild rivers. The most restrictive management provided for in the Wild and Scenic Rivers Act is a protective corridor of .25 mile along either side of a designated wild river with numerous provisions for access across the corridor. By imposing no surface occupancy along a line of sight or up to a half-mile along the previously named rivers, the BLM is vastly exceeding the intent of Congress in terms of protection and management of rivers which may be classified as scenic or recreational. We object to this type of management and strongly urge the BLM to reconsider its proposal and impose only those restrictions called for in the Act.

259-7 Finally, Table 4-3 on page 4.14 indicates that implementation of Alternative E would result in a loss of 200 oil and gas jobs with a net loss of 152 jobs. In these troubled economic times, it is the federal government's responsibility to facilitate and encourage economic stability. None of the impacts discussed in the Diamond Mountain DEIS/RMP under any alternative warrant such losses, particularly in view of the lack of discussion of normal and special mitigation measures that are used to reduce or entirely eliminate adverse impacts associated with oil and gas development in all areas. It would also appear that not only will new opportunities to explore for and develop oil and gas resources be diminished due to decreased access and increased operational costs, it appears that valid, existing rights will likely be compromised if BLM's new management proposal is adopted.

We are deeply disturbed with the BLM's evident shift in management objectives in the Diamond Mountain Resource Area, an area which contains existing oil and gas development and significant potential for future development. We strongly recommend that the BLM reevaluate the opportunities and effects associated with Alternative D, maximum mineral opportunities, particularly in terms of available mitigation measures to see if less restrictive management would

259-6 Both the upper Green River in Browns Park and the lower Green River, between Ouray and the Carbon County line, are being proposed for designation as scenic rivers in the W&SR System. It is our position that the river corridor must, in places, be protected for a distance greater than 1/4 mile. In arid regions, visual intrusions can be seen over greater distances and disturbances, such as roads, well sites and unregulated OHV use would be evident for many years. This does not mean that wells and roads can not be permitted closer to the river than 1/2 mile; but that such activities must not be visible from the river. A crossing point on the upper Green River was identified near Swallow Canyon. The plan has been modified to provide for a crossing near Four Mile Draw on the lower Green River. Both sights have been uses as crossing points. Table A7.4 has been expanded to more adequately explain our rationale for recommending a recreation classification for Argyle Creek.

259-7 This table has been removed from the proposed plan. It was developed using a computer model that on reanalysis was not applicable. Please refer to the modified socioeconomic section in Chapter 4 for a discussion of the socioeconomic impacts from the proposed plan relative to oil and gas activities.

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We appreciate this opportunity to provide you with our views and comments. Please do not hesitate to contact me should you wish to discuss these comments in greater detail.

Sincerely,

Claire M. Moseley, Manager
Federal Land Planning

c.c. James M. Parker - BLM State Director
David E. Little - Vernal District Manager
Jim Peacock - UPA

American Rivers

April 6, 1992

Penelope Smalley
Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Utah 84078

Re: Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement

Dear Ms. Smalley:

American Rivers, Inc. is the largest national conservation organization dedicated exclusively to the preservation of free-flowing rivers and their environments. Since its founding in 1973 as the American Rivers Conservation Council, American Rivers has worked to protect rivers and streams through the Wild and Scenic Rivers Act and actively helped states and local groups with river conservation efforts. Since 1987, American Rivers has assisted the Bureau of Land Management (BLM) to manage river resources on public lands. American Rivers has reviewed and commented on numerous BLM resource management plans (RMPs) and assisted the agency in developing administrative direction for consideration of potential wild and scenic rivers via the resource management planning process.

In 1992, American Rivers initiated the Project to Protect Aquatic Biodiversity on Federal Lands. The goal of the program is to participate in the resource planning process to ensure that land and resource management plans protect and maintain aquatic species and habitats on federal lands. Our program's objectives coincide with BLM initiatives like Fish and Wildlife 2000 and Bring Back the Natives which advocate watershed scale planning, the preservation of aquatic species, and the restoration of aquatic habitats.

American Rivers has more than 18,000 members, many of whom live near and benefit from the resources of the Diamond Mountain Resource Area (DMRA). We welcome the opportunity to review and comment on the DMRAs draft Resource Management Plan/Environmental Impact Statement.

801 Pennsylvania Ave. S.E.
Suite 400

I. General Comments

Habitat loss and alteration was the major contributor to the demise of approximately 75% of the 40 North American fish species which have become extinct since 1900. Entire aquatic ecosystems and their unexplored wealth of genetic diversity and biological information are disappearing -- often leaving large gaps in the food chain and fundamentally altering ecosystem function.

The Federal Land Policy and Management Act (1976, 43 U.S.C. 1701 et seq.) requires that federal agencies manage public lands in a manner that will provide good water quality, food and habitat for fish and wildlife. In addition, recent BLM programs like the Riparian-Wetland Initiative for the 1990's and the Special Status Fishes Habitat Management Plan demonstrate the agency's commitment to restoring critical aquatic habitats and maintaining viable aquatic species populations.

The role of the RMP and the responsibilities of resource managers are clearly stated in the BLM Planning Manual:

260-1 > How specific aquatic habitats and resources are to be managed is determined through resource management planning. Aquatic resource condition objectives, allowable uses on aquatic habitats, and management prescriptions for aquatic habitats are established in resource management plans.[1]

The BLM Manual also instructs managers to "determine fisheries related allocations, objectives, and management directions through resource management planning."[2] We base the substance of our comments on the degree to which the draft RMP complies with the direction and guidance of the BLM national office. It is critical that each BLM land unit and planning area use the resource management planning process to construct a sound foundation for the management of aquatic resources on public lands.

II. Riparian Management

260-2 The draft RMP cites the current BLM policy of "achieving 75% or more of riparian ecosystems in a proper functioning condition by

[1] BLM Manual: Aquatic Resource Management. USDI Bureau of Land Management (1991). 6720.13B.

[2] BLM Manual: Aquatic Resource Management. USDI Bureau of Land Management (1991) 6720.05I.

260-1 We have recommended management decisions in the proposed plan to reintroduce Colorado cutthroat trout to its former habitat. We have also recommended improvements to riparian areas, and if not achieved, the areas could be closed to livestock grazing. These are two examples of proposed decisions we hope will improve the aquatic resources on public lands.

260-2 BLM will comply with the National and Utah State Riparian policies as well as other laws, Executive Order, and Initiatives listed in Chapter 2, as part of Management Guidance Common to the Proposed Plan and the Alternatives, under riparian management.

The 330-foot protection zone starts from wherever the riparian vegetation occurs. This guideline is part of the Utah State Riparian Policy shown on page A6.1 and has been determined adequate in combination with the other guidelines listed, to adequately enhance or maintain riparian values. Please refer to the Management Guidance Common to the Proposed Plan and the Alternatives in Chapter 2 under vegetation resources, it states: "Vegetation resources will be managed according to desired ecological stages or plant communities by allotment at the activity plan level." Refer to Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives under riparian, it states: The overall objective is to achieve an advanced (late climax seral stage) ecological status, except where resource management would require an earlier ecological status for such purposes as vegetation diversity. "Vegetation Resources" includes riparian vegetation. Also see guideline number 4 of the Utah State policy regarding specific objectives and management of riparian at the activity plan level.

1997 (1.12)." Current BLM policy also proposes to: "Protect riparian-wetland areas and associated uplands through proper land management and avoid or mitigate negative impacts [and to a]cquire and expand key [riparian] areas..."[3] American Rivers commends the DMRA proposal to acquire private lands, and to form cooperative management plans in order to ensure riparian protection on lands that are not administered by the BLM. However, American Rivers does not believe Alternative E (the preferred alternative) recognizes the critical importance of riparian areas to a healthy aquatic ecosystem.

260-2 Cont. Healthy riparian zones provide good water quality; vital habitat for fish and other aquatic species; reduce sediment loads; and increase bank stability. Riparian areas are recognized today as integral components of a biologically functional ecosystem. In fact, the BLM's National Riparian Policy Statement pledges to "ensure that new resource management plans and activity plans, and existing plans when revised recognize the importance of riparian values, and initiate management to maintain, restore, or improve them."[4]

Considering the agency's efforts to identify, protect and maintain riparian areas, it is inexplicable that the DMRA's preferred alternative riparian management plan nearly halves the size of riparian protection areas which already exist under the no-action alternative.[5]

American Rivers strongly urges the DMRA to develop management standards and guidelines for riparian areas based upon site-specific ecological values.[6] The prescription of a single riparian management standard for the entire resource area

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[3] Riparian-Wetland Initiative for the 1990's. USDI Bureau of Land management (1991).

[4] National Riparian Policy Statement, USDI Bureau of Land Management, 1987.

[5] Alternative E establishes riparian protection zones of 330 feet (RMP 2.18). Alternative A (no-action alternative) delineates riparian protection zones of 600 feet (RMP 2.31).

[6] The National Riparian Policy Statement reads: "Prescribe management for riparian values that is based upon site-specific characteristics and settings."

The National Riparian Policy Statement. USDI Bureau of Land Management (1987).

260-2 Cont. diminishes the ecological significance of riparian zones. Until ecologically based riparian management standards are developed, perhaps a suitable compromise between alternatives A and E should read:

> A 600 foot protection zone would be established around all riparian areas in the resource area. Surface disturbing activities and livestock grazing would be allowed within 270 feet of this zone if there is absolutely no practical alternative, and within the 330 foot riparian protection zone only if specifically designed to protect and/or enhance the riparian values.

260-3 American Rivers commends the Diamond Mountain resource management team for their proposals to collect, compile, and evaluate baseline riparian data to determine the historical, existing and ideal conditions for a healthy riparian area (2.11). However, we are concerned about the riparian grazing standard which is proposed in the draft RMP. It reads: "Where grazing is allowed on riparian areas, the objective is to maintain a minimum herbage stubble height of three inches after livestock grazing...(2.11). American Rivers seriously questions whether the maintenance of three inches of herbage stubble will allow sufficient herbaceous biomass to provide plant vigor, bank stabilization and sediment entrapment. It is improbable that a generic three inch herbage stubble standard will provide the many concomitant benefits of biologically functioning riparian zones, including: water quality; wildlife passage corridors; and diverse channel characteristics which provide cover and habitat for fish production.

It is the responsibility of the DMRA planning team to ensure the RMP "addresses riparian-wetland needs."[7] A three inch herbage stubble standard does not address the ecological function and role of riparian areas. The fact that riparian areas are not prevalent throughout the planning area makes the management of existing riparian areas that much more important. The final RMP should include a more ecologically responsive management prescription which includes accountability standards, provisions for grazing exclusions in sensitive areas, and fencing. The standards can be fully developed through site specific planning.

260-4 The final RMP needs to provide more management direction and/or restrictions based on soil and water related criteria. For instance, what restrictions limit the amount of roading, or the

[7] Riparian-Wetland Initiative for the 1990's. USDI Bureau of Land Management (1991). p. 16.

260-3 The three-inch herbage height is a minimum and in many cases regrowth would occur after livestock are removed. It is expected that general woody riparian species would not be used heavily with an average of 3 inches of herbaceous stubble height remaining after grazing. Refer to Table 2-15 under riparian, in the proposed plan concerning riparian improvement proposals. Again, please refer to Chapter 2 Management Guidance Common to the Proposed Plan and the Alternatives, under riparian. Details such as accountability standards will be outlined in the RMP's Implementation and Monitoring Plan, developed immediately after approval of the RMP.

260-4 Riparian areas of high recreational use such as the Upper Green River in Browns Park, the Lower Green River between Ouray, Utah, and the Uintah-Carbon County line, Nine Mile Creek, and the Pariette Wetland would be limited to OHV use on designated roads and trails.

260-4 Cont. use of off-highway vehicles (OHVs) in and around riparian areas. Roads and OHV trails carry large amounts of sediment into rivers and streams -- often critically damaging vital aquatic habitats.[8]

III. The Reintroduction of Colorado Cutthroat Trout

American Rivers encourages the DMRA to continue their plans to reintroduce Colorado cutthroat trout to their historic ranges within the resource area. We also encourage the BLM to consider developing cooperative agreements with the Forest Service through Bring Back the Natives, for Colorado cutthroat reintroductions in areas that border the Ashley National Forest (e.g., Argyle and Davenport creeks).

260-5 The BLM Manual insists that individual RMPs develop fish and wildlife habitat management objectives "for habitat maintenance, improvement, and expansion for priority species and habitats." The draft RMP fails to articulate or develop (1) habitat maintenance objectives, (2) habitat improvement objectives for priority species, (3) and habitat expansion objectives. The draft RMP also fails to express any identifiable objectives for the reintroduction of Colorado cutthroat which can be evaluated through monitoring, as is also required by the BLM Manual.[9]

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[8] The BLM Manual requires resource managers to:

Identify soil and water management actions necessary to achieve the management objectives. Such direction may include but is not limited to the following:
a. Establish land use restrictions or other protective measures based on soil and water related criteria (e.g., restrictions on ORV use, access or activity limitations in floodplains, municipal watersheds, areas vulnerable to contamination from various sources of pollution, on soils prone to landslides).

BLM Manual: Supplemental Program Guidance for Environmental Resources (1986). 1621.21A.2.a.

[9] BLM Manual section 1622.1.11A.2 reads:

2. Management Objectives. Based on habitat potential and population goals set in coordination with wildlife management agencies, establish objectives for habitat maintenance, improvement, and expansion for priority species and habitats. Express objectives in measurable terms taht can be evaluated

260-5 We agree with your recommendations regarding cooperative agreements with the USF&WS and other organizations and the use of "Bring Back the Natives" program. The management objectives for riparian habitat outlined in Chapter 2 including a seven-step strategy. Current ecological condition for the major riparian areas by allotment have been identified in Appendix 8, with the overall goal of improving these areas to a late climax stage by 1997. Water quality standards are provided in Appendix 9 for major water courses in the resource area with objectives to maintain or improve these areas consistent with the State of Utah's standards. As you suggest, site specific management plans would be developed to show how these objectives would be met. Please refer to Chapter 3, per your suggestion, which provide habitat condition and management objectives for Colorado cutthroat trout. Priority fisheries habitat in this table are those areas that currently support a viable fisheries. Please refer to our responses 260-1 and 2 above concerning livestock management in riparian areas.

We realize that specific management plans will be developed in activity plans, but the BLM Planning Manual requires a much greater degree of specificity and elaboration than is present in the draft RMP.

260-5 Cont. The RMP should graphically detail (on a map) where the reintroductions are taking place, and describe population goals, priority habitat management areas, habitat expansion probabilities, and habitat improvement objectives.[10]

American Rivers suggests the DMRA planners develop a table similar to Table 3-6 (3.17) and an accompanying map which details the size and scope of the Colorado cutthroat reintroduction areas; the present condition of the habitats in those areas; and what sort of grazing management presently exists. Other basic questions that should be addressed in the final RMP include: Why are the areas described in Table 3-6 priority fisheries habitat? What are the existing habitat conditions of all the reintroduction creeks? What will be done to restore the habitat of degraded streams where reintroductions are planned?

The BLM Manual requires resource planners to use the RMP process as an opportunity to: "Identify public lands where livestock grazing will be excluded considering terrain characteristics, potential of the soil and vegetation,..., the presence of other resources that may require special management or

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a. Habitat Maintenance. Establish objectives to maintain satisfactory habitat conditions.

b. Habitat Improvement. Establish objectives to improve habitat for priority species.

c. Habitat Expansion. Establish objectives for modifying habitat, where appropriate and consistent with state population goals, so that a particular species or group of species can expand their range to occupy or reoccupy an area where habitat currently is unoccupied.

BLM Manual: Supplemental Program Guidance for Renewable Resources. USDI Bureau of Land Management (1986).

[10] A major shortcoming of the draft RMP is the poor quality of the maps of the resource area. With the exception of the Green River, the draft RMP maps do not detail any rivers or streams.

protection,..."[11] American Rivers submits that Colorado cutthroat reintroduction areas qualify for consideration of grazing closure and exclusion, or at the very least, special management (e.g., fencing). Grazing exclusions in these areas
260-5 Cont. are not unreasonable requests, particularly when the preferred alternative allows for grazing on 701,000 public acres -- fully 99% of the resource area.

It is well-documented that livestock grazing is a major cause of fisheries habitat degradation and destruction. In fact, portions of nearly all the reintroduction streams are identified as having degraded riparian areas due to improper livestock management (A8.18-19). The BLM Manual and the Multiple Uses doctrine compel the DMRA management team to provide a greater degree of planning direction and guidance in the RMP, including grazing closures and exclusions in sensitive areas where Colorado cutthroat are reintroduced.

IV. Management Indicator Species

The draft RMP uses three categories to select management indicator species (MIS): (1) special status animal species, (2) species of economic value, and (3) species with special habitat needs. The draft RMP's definition of what constitutes an appropriate MIS neglects the most critical function of indicator species. MIS are critical to measuring the effect of management
260-6 practices on species and their habitats. "Indicator" is biologically defined as: "A characteristic of the environment that, when measured, quantifies the magnitude of stress, habitat characteristics, degree of exposure to the stressor, or degree of ecological response to the exposure."[12] The final RMP should note that when utilized and monitored properly, MIS's are crucial in determining the detrimental effect of management activities on terrestrial and aquatic ecosystems.

There are 36 MIS for at least 13 terrestrial habitat types in the draft RMP. Yet there is not a single aquatic species which acts as a MIS for cold and warm water resources or riverine systems in general (3.7). The lack of indicator species for riverine systems is an oversight that should be remedied in the final RMP. Riverine systems are arguably the most important of all habitat

[11] BLM Manual: Supplemental Program Guidance for Renewable Resources. USDI Bureau of Land Management (1986). 1622.3.31A.1.

[12] Environmental Monitoring and Assessment Program, Ecological Indicators. U.S. EPA. Office of Research and

260-6 We have modified the Management Indicator Species text in Chapter 3 to include: "MIS are critical to measuring the effect of management practices on species and their habitats. When these species are utilized and managed properly, they determine the detrimental effect of management activities on terrestrial and aquatic ecosystems." We have identified macroinvertebrates, the mallard duck, and the river otter as MIS for aquatic habitat, marshes, and lakes. We have also identified special status animal species in Chapter 3 for riparian areas which include Colorado squawfish, humpback and bonytail chub, razorback sucker, and Colorado cutthroat trout. As a result of public comments we have added the Woodhouse toad and leopard frog as MIS for aquatic areas. We agree that monitoring these species is the key in determining trend. We have prioritized monitoring with special status species habitat receiving first priority, followed by riparian and aquatic species habitat.

indicator types; particularly when one considers that two-thirds of federally threatened and/or endangered species are aquatic, or spend part of their lives in the water. In addition, over the past 10 years, 10 North American fishes have gone extinct while endangered terrestrial populations have remained relatively stable.

260-6 Cont.

The BLM has made a commitment to conserving an maintaining aquatic biodiversity on federal lands. We suggest the DMRA inventory a representative variety of habitat types and select as MIS, a broad sampling of aquatic species that are dependent upon the quality and quantity of various habitat types for survival. Resource managers should regularly monitor the quality of the selected aquatic habitats and inventory populations to determine trends. Population trends should be used to locate, adjust, and/or discontinue management practices which degrade aquatic species and habitats.

V. Threatened and Endangered Species Management

BLM Manual regulations instruct resource managers to:

260-7

a. Determine, to the extent practical, the occurrence and distribution of all T/E [threatened and endangered] species on lands administered by BLM, and evaluate the significance of lands administered by BLM in the conservation of those species.
b. Identify land administered by BLM that is essential habitat and designated Critical Habitat of T/E species, and prescribe management for the conservation of these habitats in land use plans.
c. Develop and implement management plans that will ensure the conservation of T/E species and their habitats.[13]

The draft RMP summarily describes special status aquatic species occurring or having potential within DMRA in Table 3-4 (3.8). It is critical that the planning team use the RMP to develop goals and objectives for the management of endangered aquatic species occurring in the DMRA. As the BLM's Special Status Fishes Habitat Management Plan points out: "The principal planning document for management of sensitive resources is the RMP, with

[13] BLM Manual: Special Status Species Management. USDI Bureau of Land Management (1988), 6840.06A.1.a.

260-7 Please refer to our response 260-5 above. The MFP avoidance areas do not include all the 22 miles of Green River which are habitat for four endangered fish species. The management decisions outlined in the approved RMP will supersede these MFP decisions. Under the proposed plan, BLM would manage the Lower Green River as level 2 (careful management). This area would be open to activities that do not detract from special status fish, bird and plant species or Wild and Scenic river qualities. The middle stretch of the Green River would be managed as level 3 or 4 (depending on the location) with special status habitat and riparian areas protected. We believe the proposed decisions outlined in this document will improve these important areas while providing for multiple use of other resources.

site-specific activity plans then developed for implementing the RMP."[14]

260-7 Cont. The BLM Manual requires that RMPs provide more than a cursory evaluation of threatened and endangered species which might occur within the resource area. There are three federally endangered, and two special status fish species which occur within the DMRA. The draft RMP is woefully inadequate in describing special status aquatic species management plans. The DMRA is required by BLM regulations to (1) conduct habitat condition evaluations on potential T/E aquatic species habitat, (2) inventory the occurrence and distribution of special status species and the aquatic habitats in which they occur, (3) develop management plans to ensure conservation of special status species.

Threatened and endangered species habitats are described as Management Framework Plan (MFP) "avoidance areas" (3.23). Do these avoidance areas include the 22 miles of Green River which are habitat to at least three endangered fish species? Also, will RMP regulations supersede MFP avoidance areas? This is a particularly relevant question because preferred alternative E slates the mid-Green River (below Dinosaur National Monument) for Level 3 and 4 management which would make the area "available for major water development, rights of way, or other authorization with special restrictions (2.55)."

American Rivers strongly urges the DMRA to adopt the ecological systems management plan (Alternative B) for habitats in which special status species might occur. Alternative B subjects special status species potential habitats to Level 1 and 2 management and protects critical habitats from development disturbance.

American Rivers urges the DMRA planners to work cooperatively with the Forest Service, state fish and wildlife agencies, and other state agencies to compile information on endangered aquatic species populations and habitats. While aquatic species may lack the charisma of fur bearing terrestrial animals, it is the responsibility of the DMRA planning team to ensure their continued viability. As the Special Fishes Habitat Management plan makes clear:

> Good land and water management is the key to maintaining diversity of all species which, once lost, can never be recreated. Protection of these special

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[14] Special Status Fishes Habitat Management. USDI Bureau of Land Management (1991), p. 22.

260-7 Cont. status fishes and their habitats constitutes a positive step toward proper stewardship of public lands. It also enables the passing of an undiminished biota to future generations.[15]

VI. Wild and Scenic River Planning Issues

American Rivers has filed to date six Protests of Resource Management Plans. Each Protest alleged, inter alia, that the individual RMP failed to comply with the Wild and Scenic Rivers Act and explicit agency admin- istrative requiring that BLM study potential wild and scenic rivers and provide interim management prescriptions for those rivers found eligible. On June 4, 1990, the Director agreed that the four RMPs failed to comply with the Wild and Scenic Rivers Act and advised the affected State Directors that additional planning was required to comply with established requirements. One of the other RMPs was subsequently
260-8 withdrawn and American Rivers entered into a negotiated settlement of the sixth RMP, the Arizona Strip RMP.

Section 5(d) of the Wild and Scenic Rivers Act, 16 U.S.C. section 1271 et seq., requires all federal agencies to consider potential national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources. 16 U.S.C. section 1276(d). The planning responsibility imposed by section 5(d) plainly requires the BLM to assess the values of potential Wild and Scenic Rivers during the preparation of resource management plans pursuant to the FLPMA. Recognizing that responsibility, BLM Manual Section 1623.41A2d identifies wild and scenic river recommendations as a possible determination to be made in such plans.

To provide further guidance for fulfilling BLM's planning responsibilities for potential wild and scenic rivers, the agency's Washington office on July 23, 1987 circulated Instruction Memorandum No. 87-615, containing draft guidelines for identifying, evaluating, and protecting potential wild and scenic rivers on BLM lands. That guidance was promulgated by the Director in final form in Instruction Memorandum No. 87-670 and the attached Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act (the "Guidelines"), issued September 8, 1988 and renewed annually. In addition, the Director included a "Wild and Scenic River Act Plan Review Procedures Summary" ("Procedures Summary") with his June 4, 1990 Memorandum to State

[15] Special Status Fishes Management. USDI Bureau of Land Management (1991) p.19.

260-8 An error in Appendix A7.4 has been corrected. This probably led to some confusion about why we recommended a recreation classification for this segment. The outstanding values identified in Table A7.2 for potential ACECs often do not apply to the river corridors being studies for their wild and scenic river values. If the identified ACEC values occur within the river corridors, they were compared to the "Guides for Assessing Outstandingly Remarkable Values" for wild and scenic rivers (identified in Appendix 7) to determine if they should be carried forward as outstandingly remarkable values.

Lears Canyon is a dry wash of approximately 3 miles in length that is subject to flash flooding. After applying the criteria for wild and scenic rivers eligibility, located in Appendix 7, it was determined that it should not be considered further in the wild and scenic river eligibility process.

Based on your comment, the RMP team readdressed the possibility that the federally listed plant species Uinta Basin hookless cactus could occur within or be found close to the identified river corridor. It was determined that this cactus would be found on the bench areas near the Lower Nine Mile segment. This change has been made in Appendix 7, adding botanical values as an outstandingly remarkable value.

Directors concerning the resolution of existing American Rivers' Protests that clarified certain elements of the study process.

260-8 Cont. Under the directions established in the Guidelines, planning for potential wild and scenic rivers on BLM lands follows a relatively straightforward, three-step procedure. Each BLM resource management plan is to:

(1) evaluate the eligibility of potential wild and scenic rivers within its planning area for inclusion in the National Wild and Scenic Rivers System in accordance with the criteria set forth in Section 1(b) of the Wild and Scenic Rivers Act (i.e., whether the river is free-flowing and possesses one or more "outstandingly remarkable" values);

(2) determine the appropriate classification ("wild," "scenic," or "recreational") for rivers found to be eligible;

(3) assess the suitability of such rivers for inclusion in the national rivers system, based upon the public values and uses that would be enhanced or foreclosed by such protection, the degree of public, state and local interest in designation, and practical concerns regarding costs and feasibility of administration.

Guidelines, Section VIII, at 9-12.

Until a final decision is reached by the agency and, for recommended rivers, by Congress, BLM is to protect river resource values and characteristics through specific management prescriptions established in specific or programmatic interim management plans. Guidelines, Section IV.C., at p. 7; Section IX, at p. 20.

VII. Comments Concerning Eligibility

American Rivers commends the planners for evaluating 76 streams and rivers in the DMRA. Such a broad evaluation is consistent with Bureau policy.

The description of Argyle Creek states that the stream has been classified as recreational due to "disturbances along the river corridor." Table A7-4. This description, however, is inadequate to explain why a scenic classification would not be appropriate for the entire 21.5 mile segment or portions of the stream.

We commend the planners for finding 116 miles of the Green River eligible for inclusion in the national rivers system. E.g., Table A7-4. Similarly, American Rivers appreciates the planners documentation of the outstandingly remarkable scenic and cultural values possessed by Nine Mile Creek. Id.

260-8 Cont. American Rivers is concerned, however, that various significant resource values which were addressed in the discussion of Areas of Critical Environmental Concern (ACECs) do not appear in the discussion of potential wild and scenic rivers.

For example, Lears Canyon is described as possessing outstanding biological diversity values, Table A7-2, however, there is no apparent discussion of the potential eligibility as a wild and scenic river of the stream within Lears Canyon.

The description of the botanical values associated with Nine Mile Canyon, Table A7-2, suggests that the stream possesses outstandingly remarkable ecological or botanical values, however, that is not recognized in the discussion of the stream's wild and scenic river eligibility.

VIII. Suitability Assessments

American Rivers is disappointed in the cursory and inadequate discussions of suitability included in the Draft RMP.

For example, there is no meaningful analysis presented in the EIS of the consequences which flow from the decision not to protect the outstandingly remarkable values of free-flowing streams. This omission calls into serious question the validity of any of
260-9 the decisions that a particular river is not suitable. Thus, although the suitability analysis contained in the FEIS addresses the bare form of BLM policy which requires that decisions to recommend or not to recommend inclusion of eligible rivers in the national rivers system be based on extensive analysis, there is inadequate analysis of either the rationale or the consequences of the decisions not to find suitable particular eligible rivers.

The suitability analysis completely fails to explain how the BLM weighed the various factors required to be considered in its decision on suitability.

IX. Management Prescriptions

260-10 The Final RMP should include detailed management prescriptions to protect the resource values of eligible and suitable river segments.

260-9 This section was strengthened in the final document. See the sections entitled "From Management Action for Special Emphasis Areas" contained within the analysis for each resource impacted. Also refer to Appendix 7.

260-10 Wording has been added to the table in Chapter 2 Management Prescriptions for Special Emphasis Areas outlining the management prescriptions that would be followed to protect rivers recommended for designation until such time as action is taken by Congress.

In order to protect the resource values and character of its potential wild and scenic rivers until a decision is reached regarding their designation, BLM's Guidelines require agency planners to establish detailed management prescriptions. The Guidelines state: "... the RMP must prescribe the protection (interim management prescriptions) to be provided for the river and adjacent public land area pending the suitability and, when necessary, subsequent action by the Congress." Guidelines, Section VIII.A.3.a., at p. 11 (emphasis added).

260-10 Cont.

The Guidelines address in detail the scope of management prescriptions that should be adopted:

> Specific management prescriptions for river corridors identified from the NRI list, or otherwise identified for study, should provide protection in the following ways:
>
> 1. Free-flowing values. The free-flowing characteristics of such identified river segments cannot be modified to allow stream impoundments, diversions, channelization, and/or rip-rapping to the extent the BLM is authorized under law.
>
> 2. River values. Outstandingly remarkable values of the identified river segment or area must be protected (subject to valid existing rights) and, to the extent practicable, enhanced.
>
> 3. Classification Impacts. Management and development of the identified river and its corridor cannot be modified, subject to valid existing rights, to the degree that its eligibility or classification would be affected (i.e., its classification cannot be changed from wild to scenic, or scenic to recreational).

Guidelines, IX, B., at 1-20.

The Final RMP should adopt management prescriptions as required by BLM policy.

X. Additional Comments

Only through full documentation of the basis for BLM's findings can the public be assured that the agency has in fact given these streams the consideration mandated by section 5(d) of the Wild and Scenic Rivers Act, and that rivers and streams with potential as additions to the national rivers system have not been rejected on a superficial examination.

The fundamental importance of such documentation is plainly expressed in the Guidelines: "The RMP record of decision (ROD) serves as the release document for river areas, or portions of river areas/segments, determined nonsuitable for WSR river designation." Section VIII.B.1.

Moreover, pursuant to the National Environmental Policy Act (NEPA), the planning documents must assess the potential environmental impacts of any decision not to recommend rivers for inclusion in the national rivers system. In California v. Block, 690 F.2d 753 (9th. Cir. 1982), the United States Court of Appeal for the Ninth Circuit held that the Forest Service is required to prepare a site-specific EIS when it decides in its planning process to release potential wilderness areas for nonwilderness uses. BLM decisions not to recommend designation for potential wild and scenic rivers, like decisions releasing potential wilderness areas, irretrievably commit the resources of such rivers and their adjacent lands, and require similar site-specific environmental analysis. Even where the BLM establishes relatively protective prescriptions for a river area in its RMP, such as an ACEC, the decision not to recommend Wild and Scenic River designation exposes the river to a continued risk of hydroelectric development that may degrade or destroy the river's free-flowing character, and to mineral development that may impair its outstanding natural values.

American Rivers' concern with the depth of the planners' eligibility analysis is not a mere academic concern. In addition to identifying eligible streams, the description of outstandingly remarkable values is a central component of any suitability study. The heart of the suitability determination is a consideration of the characteristics that make a river and its corridor a worthy addition to the national rivers system. Guidelines, section VIII.A.3. That analysis is crippled if the eligibility determination is incomplete. Also, streams not found eligible are subject to management activities which may impair or even preclude their later inclusion in the national rivers system.

We trust these comments assist the planning team complete and improve the RMP. Please do not hesitate to communicate with us if you have any questions concerning our comments on DMRA

fisheries issues and/or wild and scenic planning. American Rivers looks forward to working closely with the Diamond Mountain Resource Area.

Sincerely,

Thomas J. Cassidy, Jr.
General Counsel

Christopher A. Wood
Fisheries Program Coordinator

cc: Jack Williams
Fisheries Program Manager
Bureau of Land Management

March 23, 1992

Penelope Smalley
Team Leader
Bureau of Land Management
Vernal District
170 South 500 East
Vernal, Ut. 84078

TO WHOM IT MAY CONCERN:

I believe in livestock management in all areas.

261-1 I disagree with the proposal to planting wildlife, such as elk, moose, and big horn sheep in the Nine Mile Canyon area:

1. They will always be on the private land,(as the deer and elk that are in the area are already.)

2. The bottom of the canyon is mostly private farm land which the wildlife will want to feed because of the forage of alfalfa hay and grass pastures.

3. The deer and elk already tear down all the fences in the area, that we are constantly repairing.

4. Then we have the public hunting to put up with, the tresspassing, breaking locks and gates, littering, shooting livestock, and tearing up our roads, causing more errosion.

On livestock management in the Devils, Five Mile, and Bull Canyon allotments, the elk are in the area before the livestock are, and are still there after the livestock are pulled off. The Five Mile allotment is continuously used by the wildlife. I believe if these allotments are to have wildlife the the D.W.R. should help maintain all the improvements of fences,water, and roads along with the expense of the permittees. The permittees are the ones who have to maintain

RESPONSE TO COMMENT LETTER 261 (FASSELIN)

261-1 Under the proposed plan, we would authorize the reintroduction of bighorn sheep for the historic habitat in Nine Mile Canyon. Based on those concerns you have addressed, plus the possibilities of disease transmission, we have ranked the Nine Mile Canyon as #4 out of the 5 reintroduction areas for the resource area. Private landowners would be involved in any bighorn sheep reintroductions to help resolve issues prior to any release in Nine Mile Canyon. We are not proposing any elk or moose transplants for the Nine Mile Canyon area, but would allow their numbers to grow from existing herds if forage was available. We would be willing to discuss fence modifications, such as let-down fences, which might reduce the amount of fence repair. Such an option may reduce the impact off big game on fencing in the area. UDWR has provided over half of the seed on the greenwood sale area in the Five Mile allotment, helping improve forage for wildlife and livestock. We have also worked with UDWR to establish wildlife-livestock forage studies on this allotment to monitor use and better manage available forage.

and repair the fences, but the livestock isn't tearing them down, the wildlife is. I also believe that D.W.R. should manage the wildlife and rotate them along with the livestock.

As far as livestock management in these allotments, I feel I have utilized the forage evenly by dispursing livestock over the area.

Sincerely,

G & G Fasselin

G & G Fasselin
Nine Mile Canyon

Utah Wilderness Association

455 East 400 South #306/Salt Lake City, UT 84111/(801)359-1337

March 31, 1992

Ron Trogstad
Diamond Mountain Resource Area Manager
170 South 500 East
Vernal, UT 84078

Dear Mr. Trogstad:

Enclosed are our comments on the Diamond Mountain draft Resource Management Plan. The Diamond Mountain Resource Area contains some of the most important natural terrain in the state even though it is largely roaded. It is winter range for ungulate herds that use the Uintas--Utah's most pristine mountain ecosystem--and contains several miles of the Green River with its attendant wetlands.

The draft RMP contains one critical omission. There is no range of alternatives regarding livestock, all alternatives allocate the same amount of forage to livestock. We recognize the BLM apparently feels that these issues have been adequately addressed in the Ashley Creek and Three Corners grazing EISs and subsequent RPS decisions (page 2.9). We do not concur with this conclusion. Those EISs were completed in 1982 and 1979 respectively. Ten years have passed since that time and the decisions surrounding range and forage allocations need to be reconsidered. FLPMA anticipated that plans would be revised regularly (section 202). Most federal land agency plans are revised on a ten year basis. Thus, omission of this critical issue is inappropriate and casts some doubt on what is a fairly good document.

The significant concern over range allocation aside, the Resource Area has done a commendable job in preparing the RMP. While the proposed action (alternative E), needs important strengthening, it does contain many positive recommendations. Alternative B, with a few modifications, would better represent a comprehensive and balanced alternative for management of the Diamond Mountain Resource Area.

The real test of this RMP will be in its implementation. It can't be considered as a site-specific decision for a whole bunch of projects. Rather, it should be viewed as a guide for managing the Resource Area.

RANGE/VEGETATION

278-1 The omission of livestock forage allocation alternatives has created some problems with the draft RMP. For example, the draft indicates that

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RESPONSE TO COMMENT LETTER 278 (UTAH WILDERNESS ASSOCIATION, Macfarlane)

278-1 In Alternative B, livestock closures were recommended on municipal riparian areas, T&E habitat, and bighorn sheep reintroduction areas. Also, to accommodate an increase in wildlife use, livestock reductions would be necessary due to minimal rangeland treatments proposed in this alternative. A 25,292-AUM loss for livestock was analyzed in Chapter 4, but was not shown as an initial reduction on the areawide decision matrix (Table 2-15). This error was corrected and now reads: "Establish livestock grazing preference at 25,007 AUMs."

The other alternatives will remain initially at 50,299 AUMs due to no complete closures to livestock initally, affecting existing use outlined in the proposed plan or Alternatives A, C, and D. Possible reductions to livestock from livestock/wildlife conflicts for forage in crucial wildlife habitat could be mitigated by rangeland treatments and management practices (see Table 2-15 for livestock and vegetation). Any AUM losses to livestock due to negotiation to eliminate domestic sheep from proposed bighorn sheep reintroduction areas in Alternatives A and E would be over time and done voluntarily by grazing operators through change in class of livestock and alternative grazing systems (again, refer to Table 2-15 under livestock).

There has been significant livestock reductions in the past as stated under the "Forage Allocation History" section in Appendix 8. Since 1980, 4,904 livestock AUMs have been reduced. Since 1989, 972 livestock AUMs have been reduced affecting 4 allotments, and significant management changes have been made on 6 allotments. All of these adjustments were made through agreement as part of the 1989 Ashley Creek Range Program Summary. The Ashley Creek and Three Corners Grazing EIS did not clearly analyze the forage needs for objective (desired future) wildlife levels as stated in Chapter 2. As part of the Diamond Mountain RMP, both livestock and wildlife forage needs by alternative, were analyzed and compared to existing forage available by allotment (see Table A2-1).

This analysis has shown us that we are very close to meeting both livestock preference and wildlife proposed increases under Alternative E with range improvement and management practices providing additional forage to fulfill the requirement.

In Alternative B, due to the least amount of range improvements proposed and the largest increase in wildlife AUMs, along with proposing reducing livestock use to accomplish goals in this alternative, livestock preference would be reduced initially to 25,007 AUMs in Alternative B.

278-1 Cont. livestock forage would be the same for every alternative (page 2.46), yet proposes different areas that would be protected from livestock grazing (page 2.47) and differences in vegetation treatment projects (page 2.58). In an inconsistent twist, the RMP also claims that the alternatives could add or reduce the number of livestock AUMs by varying amounts (pages 4.17, 4.27, 4.38, 4.46 and 4.55).

These inconsistencies need to be rectified. The document recognizes that wildlife forage allocation decisions need to be made (page 2.9). It is impossible to gain a comprehensive or cumulative view of vegetation management issues without analyzing both wildlife and livestock forage allocation.

Since the draft RMP did not include grazing alternatives, it apparently also chose to ignore standards for livestock use and utilization. While the information in Appendix 8 is quite useful, it does not give an overall view of the resource area with respect to livestock grazing. Goals for specific seral conditions could be implemented for various categories of land identified in the alternatives. Another example would be providing utilization standards for riparian areas or uplands (such as a stubble height or utilization percent), and varying those standards based upon the goals and objectives of the different alternatives. This would provide important direction for completing site specific allotment management plans. At the very least, utilization standards would provide management direction until AMPs are updated or completed.

278-2 Such an integrated approach is important. Appendix 8 makes it clear that the allotment categories (C, M, and I) have already been selected. How do these categories relate to the various land allocation and classification scenarios developed in the various alternatives? This rhetorical question raises the concern of having two separate planning processes for the Resource Area, the RMP and the two decade old grazing EISs, that are not well coordinated.

278-3 The RMP proposes several thousand acres of pinyon juniper and/or sagebrush treatments (presumably chainings or fire) under each alternative (page 2.58). However, the RMP does not indicate areas of potential treatment, how those specific areas will be treated or analyze cumulative impacts of those treatments even in a general sense. Range treatments are not benign, they can have tremendous impacts on a variety of resources including nongame song birds, visuals, archaeological sites and sage grouse. The RMP only mentions the assumed positive benefits to livestock, some game species and in some instances, soils and watersheds (NOTE: the benefits and impacts of activities like chaining on soil and watersheds are a matter of considerable dispute in the scientific literature). Without a better analysis of impacts of this type of activity, the RMP fails NEPA's requirements. The type of treatment, burning versus chaining, also has varying ecological as well as social impacts.

Standards should have been considered for vegetation treatments as well. For example, limiting pinyon juniper clearings to certain sizes and a certain percentage of forest tracts would avoid changes that could negatively affect small birds or mammals by large area type conversions.

General goals for vegetation management are stated under "Vegetation" in Table 2-15. In Chapter 2's management common to the proposed plan and all alternatives, under riparian it states: "Where grazing is allowed on riparian areas, the objective is to maintain a minimum herbage stubble height of 3 inches after livestock grazing to provide sufficient herbaceous biomass to meet requirements of plant vigor, maintenance, bank protection, and sediment entrapment." Also in this chapter, under Vegetation Resources, it states: "Vegetation resources will be managed according to desired ecological stages or plant communities by allotment at the activity plan level."

278-2 Allotment categorization was done during the writing of the Grazing EISs and was also re-evaluated under BLM policy criteria during the present RMP process. The criteria for categorization stays the same by alternative; these are resource potential, resource use conflicts or controversy, opportunity for positive economic return, and present resource condition. These criteria generally stay the same for each alternative but the allocation of resources and methods for managing resources and achieving objectives may be different.

278-3 Vegetation treatment is guided by the statement in Chapter 2 under Vegetation Resources, Management Common to All, as follows: "Vegetation treatment is implemented where plant species diversity, watershed conditions, and forage production are below potential; to achieve a desired ecological stage or plant community; to control noxious weed or insect infestations; or to meet activity plan objectives. Such treatments include mechanical treatments (chaining), chemical treatment (herbicide applications), biological treatments (grazing), prescribed fire, reseeding, and construction of control structures (see Appendix 7). Vegetation treatment projects are subject to NEPA review prior to initiating any action and are guided by the 1991 Bureauwide vegetation treatment EIS." Impact analysis is addressed generally for all vegetation treatment methods in the 1991 "Vegetation Treatment on BLM Lands" EIS. As stated in Appendix 8, "if pinyon/juniper areas will not carry a fire, chaining may be substituted." "Standard Operating Procedures" for chainings are also listed in Appendix 8. Although there may be some insignificant, short-term (1 to 2 years) losses to soil erosion before vegetation establishment, there are significant long-term (15 year plus) benefits such as 344,250 tons of soil remaining on site on 22,950 acres treated in the proposed plan as discussed in the cumultative impacts section of Chapter 4. Other significant benefits discussed in Chapter 4 impact analysis, are increased vegetation diversity and increased forage for wildlife and livestock.

See standards for rangeland improvements in Appendix 8. As stated, design of vegetation treatments relating to effects on wildlife and aesthetics are closely analyzed in cooperation with the Utah Division of Wildlife Resources (UDWR) prior to on-the-ground development.

MINERALS

278-4 The proposed leasing of every acre under every alternative is a major problem in the RMP. While the draft RMP proposes to use the no-surface occupancy (NSO) stipulation is some areas, this stipulation has potential legal limitations and it can be modified after a lease is issued. For example, large tracts of NSO areas with a greater than two mile radius could be construed as denying access to the minerals in the center of an area since directional drilling can only be effective up to about one mile. Under this scenario, the BLM may be legally forced to change the lease stipulations.

BLM has the legal authority and mandate to deny mineral leasing in important areas. The 1920 Mineral Leasing Act and its 1987 amendments make this clear. Leasing every acre is contrary to multiple-use principles embodied in FLPMA. In lieu of multiple-use, the RMP proposes mineral primacy under every alternative. The BLM should change the NSO recommendations in the various alternatives to no lease recommendations to alleviate these problems.

278-5 The areas proposed for level 1 and level 2 management under alternative B should not be leased for oil and gas (phosphate as well) because they include important archaeological sites, other ACECs, wetlands, river corridors, threatened and endangered species sites and wildlife winter range. In addition, all of the Diamond Mountain region between Dinosaur National Monument and the Wyoming border should be closed to leasing. This is critical big game habitat and it is rated as having a low potential for minerals in the RMP.

278-6 Alternative E offers inadequate protection from oil and gas activities. The proposed leasing of the Ouray National Waterfowl Refuge and most of the Nine Mile Canyon ACEC is not in the best interests of those resources. It is impossible to protect significant wetlands while allowing oil and gas development. Of course this raises the question of how the minerals under the Refuge came under the jurisdiction of BLM and not the Fish and Wildlife Service.

278-7 The mineral sections in the RMP do not meet NEPA's mandates for site-specific analysis prior to decision making. There is no quantification of impacts to wildlife from an all out oil and gas leasing program, proposed under alternative E (page 4.54). The one sentence description on page 4.54 gives no idea of the impacts as required by NEPA.

278-8 The foreseeable oil/gas development scenario for the Resource Area (Appendix 4) does not differentiate between alternatives. Is one to assume the various alternatives are no different because all lands will be leased under every alternative? If so, this proves that lease stipulations do not provide more environmental protection if development impacts would be the same under every alternative. BLM inadvertently makes the case that no lease options must be considered for sensitive lands.

Thus, the mineral sections in the RMP are inadequate upon which to base decisions. That contention is supported in a number of legal proceedings such as Conner v. Burford, the Palisades decision, and the Bob Marshal Alliance case. Simply put, the analysis in the RMP is inadequate prior to issuing leases. Post-RMP tiered NEPA documents and attendant decision documents are needed before any leasing can take place.

278-4 A modification to an oil and gas lease stipulation "...is a change to the provisions of a lease stipulation, either temporarily or for the term of the lease,..." (BLM Handbook "Planning for Fluid Mineral Resources, H-1624). While it is true that oil and gas lease stipulation may be modified, "...all circumstances for granting a waiver, exception, or modification must be documented in the plan or plan amendment,..." (Ibid.) According to BLM policy lands may only be closed to leasing in areas "...where it has been determined that other land uses or resource values can not be adequately protected even with the most restrictive lease stipulations and that appropriate protection can only be ensured by closing the lands to leasing,..." (BLM Manual 1624 "Supplemental Program Guidance for Energy and Mineral Resources).

Therefore, if the oil and gas resource is not accessible with current technology then it does not follow that the land should be closed to leasing, especially if the resource is protected using a No Surface Occupancy stipulation. Technology may change over the next 15 year-period which may allow for successful exploration and production in such areas of No Surface Occupancy.

278-5 Thank you for your comments.

278-6 As quoted in Public Land Order 3999:

By virtue of the authority vested in the President and pursuant to Executive Order No. 10355 of May 26, 1952 (17 F.R. 4831) it is ordered as follows:

1. Subject to valid existing rights, the following described lands are hereby withdrawn from all forms of appropriation under the public land laws, including the mining laws (30 U.S.C., Ch 2), but not from leasing under the mineral leasing laws, and are added to and made a part of the Ouray National Wildlife Refuge...

(Refer to the PLO for the specific lands described)

278-7 The text has been modified in Chapter 4 as you suggested.

278-8 The priority management areas maps indicate that management of lands for oil and gas leasing, because of a differing amount and kind of restrictions, would be different under the proposed plan and each alternative. Therefore, the percentage of the total number of forecasted oil and gas wells (in the Reasonable Foreseeable Development, Appendix 4) which would not be drilled under each alternative would also be different. The number of precluded oil and gas wells on moderate to high oil and gas potential lands for the proposed plan or each alternative is: The proposed plan - 19.3 precluded wells; Alternative A - 19 precluded wells; Alternative B - 88 precluded wells; Alternative C - 2.4 precluded

278-9 The recommendations for locatable minerals are somewhat confusing. The differences between pages 2.44 and 2.49 for alternative E need to be clarified. Page 2.44 indicates only a tiny percentage of the Resource Area would be withdrawn from mineral entry under alternative E, but page 2.49 indicates more terrain would be withdrawn.

Alternative B is also confusing. Page 2.20 shows a total of 467,500 acres of surface and subsurface proposed to be closed/restricted from mineral use. However, page 2.44 shows 414,600 acres proposed to be withdrawn. Why is there this inconsistency?

If page 2.44 is accurate, most of the land designated as ACECs and critical wetlands like the Refuge would be open to mineral entry. It makes no environmental sense to allow hardrock mining or exploration in a wetland. Yet, that is precisely where such activity is most likely to occur in this resource area (for example, along the Green River).

The RMP notes in appendix 4 that there is little potential for locatable mineral development in the Resource Area. Given the fact that mineral exploration work associated with mining claims, particularly in wetlands, has disastrous impacts and the fact that BLM's own regulations do not allow for agency oversight on projects less than 5 acres in size, all critical areas on the Resource Area ought to be withdrawn or segregated from mineral entry. Leaving virtually all of the Resource Area open to the the 1872 Mining Law does not meet multiple-use mandates for balanced land management. All it does is allow the public land to be abused in the search for mineral resources that BLM admits are not there.

RECREATION/TRAVEL MANAGEMENT

278-10 Extensive development has left little roadless land in the Resource Area. That fact is reflected in the recommendations for small and scattered tracts of semi-primitive non-motorized areas. All the ACECs and critical wildlife habitat should only be open to vehicles on designated roads to protect resources such as archaeological sites, frail soils, wetlands, rare plant sites and black-footed ferret habitat. The two small WSAs should be closed to ORV to provide semi-primitive motorized recreation opportunities. No place in the Resource Area should allow cross country travel.

Additionally, redundant low standard roads and trails should be closed and standards (for example, no more than one mile of open road or trail per square mile of land) should be adopted to protect wildlife and provide recreation opportunities for non-motorized users. Alternative E proposes increasing vehicle use that would harm wildlife, in particular cougar and black bear (page 4.60). It is ironic that this alternative proposes additional help for black bears by prohibiting baiting but then allows increased vehicle access.

Research has shown a direct correlation between damage to cultural resources and vehicle access. Thus, vehicle use should be limited to existing high standard roads in the Nine Mile Canyon ACEC. The RMP only

wells; and Alternative D - 2.4 precluded wells.

278-9 We have modified the description of restrictions under the proposed plan and for each alternative to clarify these recommendations.

It is important to distinguish between withdrawals and surface use. The planning restrictive levels are not necessarily meant to describe precisely the same lands as those slated for withdrawal.

Designation of ACECs and other critical areas can be an effective management tool since doing so creates areas within which mining plans are rrequired for all locatable activities. Current law, regulations and policy does not allow BLM the discretion to simply close lands to locatable mineral activities. So planning measures, such as ACEC designation, while not closing lands per se, helps allow BLM to more effectively manage resource values sensitive to locatable mineral development.

278-10 You are correct in your statement that there are not many roadless areas remaining in the resource area. That is why we feel it is important to protect those areas that are left. See Table 2-5 for a summary of OHV restrictions. Both WSAs in the resource area are proposed for semi-primitive, nonmotorized use, if the areas are not designated wilderness areas. We will be closing some roads where use will be limited to designated roads yearlong. OHV use in Nine Mile Canyon will be limited to designated roads and trails in the spring and fall of each year. It was felt that additional restrictions would not be necessary to protect cultural resources. Areas will be posted and roads will be identified for travel. This will be necessary to comply with state laws.

278-10 Cont. The RMP should set a proactive management scenario for the travel plan that will be tiered to it. Proactive management should include a policy of posting areas open, rather than closed (areas are closed unless posted open), and closing areas before problems develop.

SPECIAL MANAGEMENT AREAS

278-11 The recommendations for ACECs in alternative B and to a lesser extent, alternative E, are quite good. However, the proposed management of those areas often contradicts the values those ACECs are supposed to protect. Recommendations for better ACEC management are included in other sections of this comment.

278-12 The Wild and Scenic River study recommendations in the RMP need clarification. First, are all the Green River segments being recommended in alternative E (or any other alternative for that matter) as suitable as Scenic and Recreational Rivers? Page 3.62 would seem to indicate this is the case yet Appendix 7 recommends the middle segment as unsuitable. This needs to be clarified as we don't see how BLM is complying with its regulations under the Wild and Scenic Rivers Act and NEPA (see BLM IM 88-670, subsequent updates, and BLM Handbook 1623).

Second, the lower Green River segment is inappropriately classified. The lower Green River from the Carbon County line to just above Fourmile Wash meets the criteria for a Wild river. The only notable access is the Sand Wash boat ramp, and it is a dirt road. Wild Rivers are "**generally** inaccessible except by trail" (emphasis added) and this segment meets that definition.

WILDLIFE/RIPARIAN

278-13 BLM makes some commendable recommendations in the RMP including the reintroduction of black-footed ferrets and a ban on bear baiting. The proposal for reintroduction of bighorn sheep under alternative B is also of merit. However, adequate analysis to ensure that viable habitat is available should occur before a reintroduction is attempted. There are too many examples of failed bighorn sheep reintroductions where prior analysis could have determined conflicts.

278-14 Unfortunately, too much critical wildlife habitat is available for destructive activities (see other resource sections of this comment). Impacts from livestock grazing are largely ignored because livestock forage allocation has not been considered. Cumulative impacts to wildlife from mineral development are lacking, particularly a worst-case scenario required under NEPA regulations and subsequent court decisions (see also the minerals section)

278-15 Riparian areas do receive considerable discussion in the RMP because of their inordinate value to wildlife and fisheries. Yet, it appears the only protection for riparian areas would occur within special emphasis areas. Even that protection is weak because alternative E allows a loophole as wide as a bulldozer. All riparian areas should receive protective standards

278-11 Thank you for your support, please refer to our specific response 278-12 below.

278-12 Two Green River segments are recommended in the proposed plan. They are the segments between Little Hole and the Utah-Colorado State Line, and the segment between the public land boundary south of Ouray and the Uintah-Carbon county line, south of Sand Wash. All river segments found eligible and suitable for futher study in our preliminary analysis are recommended for designation in Alternative B. Our analysis showed that there are several access points along both the right and left banks that influenced our recommendation as a scenic rather than wild river.

278-13 We recently agreed to a memorandum of understanding with the National Park Service, Colorado State University, UCWR, and Colorado Division of Wildlife to evaluate habitat for future reintroductions. Habitat models, as well as geographic information system (GIS) technology would be used to evaluate habitat and potential conflicts.

278-14 Please refer to our response 278-7 above and the text changes in Chapter 4.

278-15 All riparian areas on BLM-administered lands within the Diamond Mountain Resource Area will be managed in accordance with the Bureau and Utah State Riparian policies. Refer to Appendix 6.

278-15 Cont. similar to those located in the special emphasis areas under alterantive B. As it currently stands, the RMP does not meet BLM's own riparian policy and guidelines. (see IM UT 87-261 and Jan. 22, 1987 BLM Riparian Area Management Policy).

LANDS

278-16 BLM identifies potential land for transfer or disposal on page 3.21. Is this proposal the same for all alternatives? Some of the land proposed for disposal/exchange contains extremely high public values and does not meet BLM's criteria for disposal (see FLPMA section 203), though exchange with another public entity, state or federal, may be appropriate (FLPMA, sec. 206). In particular, we are concerned about the land on Diamond Mountain with its unmatched wildlife values and the tracts within the Nine Mile Canyon drainage which contain critically important cultural resources.

SUMMARY

278-17 While the draft RMP has many positive points, several questions remain. When finalized, will the RMP be used as guidance for activities and subsequent NEPA documents with public involvement or will it be considered the decision for those site-specific projects? Our experience has been that these large planning documents are considered as site specific NEPA justification for a laundry list of development projects after the ink is dry on the final. An RMP is only the first step. Public involvement in agency decision making tiering from this RMP and site-specific NEPA documentation must continue.

If you have any questions, please feel free to contact our office. We would also be very willing to engage in a meeting or discussion with you and your staff regarding this RMP prior to the final.

Sincerely,

Gary Macfarlane
Conservation Director

278-16 The lands section of Chapter 3 has been modified for clarity. Please refer to Table 2-15 for the proposed decisions for land tenure adjustments. Please note that the initial acreage figures for the proposed plan and the alternatives differ due to the management of resource values for any particular plan. Criteria for any land ownership adjustments are outlined in Chapter 1.

278-17 Please refer to Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, which outlines the criteria to be used for site-specific plans/actions and associated environmental review subsequent to the RMP. Public involvement will be sought and encouraged throughout any such subsequent site-specific analyses, as necessary, as required by NEPA and the Council on Environmental Quality regulations.

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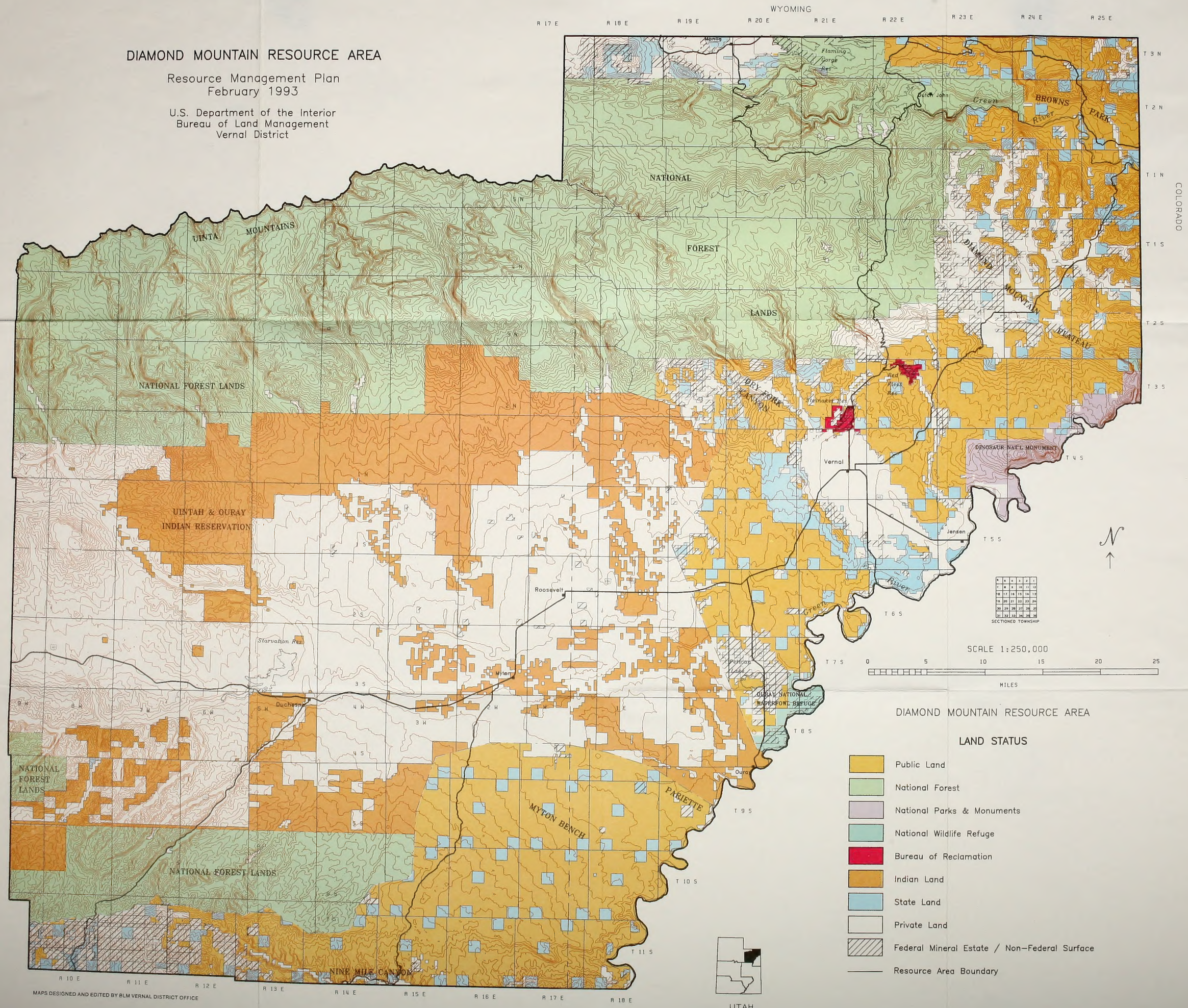
Map Packet # 1

Diamond Mountain Resource Area, Ownership

DIAMOND MOUNTAIN RESOURCE AREA

Resource Management Plan
February 1993

U.S. Department of the Interior
Bureau of Land Management
Vernal District



DIAMOND MOUNTAIN RESOURCE AREA

LAND STATUS

- Public Land
- National Forest
- National Parks & Monuments
- National Wildlife Refuge
- Bureau of Reclamation
- Indian Land
- State Land
- Private Land
- Federal Mineral Estate / Non-Federal Surface
- Resource Area Boundary

Map Packet # 2

Grazing Allotments and Major Roads

ALLOTMENT NUMBER	ALLOTMENT NAME	ALLOTMENT NUMBER	ALLOTMENT NAME	ALLOTMENT NUMBER	ALLOTMENT NAME
04049	GREEN RIVER (PRRA)	04867	DINOSAUR PARK	14807	RYE GRASS
04109	STONE CABIN (PRRA)	04869	SHINER	14809	SEARS CANYON
04111	SULFER CANYON (PRRA)	04870	ISLAND PARK	14810	GADSEN DRAW
04128	KYUNE I (PRRA)	04872	POWELL/SADLIER	14811	LITTLE HOLE
04804	WATSON	04873	ARGYLE RIDGE	14812	JACKSON-CROUSE-DRY HOLLOW
04808	TAYLOR FLAT	04874	FIVE MILE	14813	NORTH WARREN DRAW
04809	RED CREEK FLAT	04875	LEARS CANYON	14814	MARSHALL DRAW
04816	MAME HOLE-BEAR HOLLOW	04876	WATER CANYON #1	14815	HOY MOUNTAIN
04817	SMOKEM-UP	04877	CURRENT CANYON	14817	COVE & W. COW HOLLOW
04828	SERVICEBERRY SPRING	04878	BULL CANYON	14818	LAMBSON-CROUSE-DAVIS
04829	WEST POT CREEK	04879	WATER CANYON #2	14820	NATURAL LAKE
04830	LOG CABIN	04880	ODEN	14822	EAST COW HOLLOW
04834	HATCH COVE	04881	GADSEN	14823	BATES SPRING
04835	COOPER DRAW	04882	DEVIL CANYON	14824	BLAIR BASIN
04837	DIAMOND MOUNTAIN	04883	PARLEY CANYON	14825	MCKEE SPRING
04838	SCHOOL BUS DRAW	04884	DEEP CREEK	14826	MAIL DRAW
04845	EAST LITTLE MOUNTAIN	04885	WILLOW SPRING	14827	SOUTH WARREN DRAW
04846	WEST LITTLE MOUNTAIN	04886	WEST PELICAN LAKE	14833	RUPLE CABIN
04847	MOSBY	04887	WILKERSON	15801	RICH & STETSON
04848	SMELTER SPRINGS	04889	FLYNNS POINT	15802	OURAY ROAD
04849	SHINDY	04891	TWIN KNOLLS	15803	WEST HUBER
04850	HACKING	05805	MCCOY FLAT	15807	AUNT KNOLL
04851	JOHNSON	05807	ASPHALT RIDGE	15808	HALFWAY HOLLOW
04852	PERRY	05812	PELICAN LAKE	15809	YOUNG
04853	COTTONWOOD SPRINGS	05814	HORSESHOE BEND	15810	HOLMES-PALMER
04854	DRY FORK	05880	LITTLE DESERT	15811	EAST HUBER
04855	COAL MINE BASIN	05881	BIG WASH	15813	TWELVE MILE
04856	SPRING CREEK	05886	CASTLE PEAK	15815	OURAY VALLEY
04857	RED MOUNTAIN	05887	EIGHT MILE FLAT	15816	CANAL
04858	BRUSH CREEK	14800	THREE CORNERS	15877	WETLANDS
04859	DONKEY FLAT	14801	WILLOW CREEK	15878	GREEN RIVER BOTTOMS
04860	PADDYS GAP	14802	CLAY BASIN	15879	ANTELOPE POWERS
04861	DIAMOND RIM	14803	GOSLIN MOUNTAIN	15884	WELLS DRAW
04862	S.J. HATCH	14804	CLAY BASIN MEADOWS	15885	BIG WASH DRAW
04863	MCFARLEY FLAT	14805	BRIDGEPORT		
04865	LITTLE BRUSH CREEK	14806	BEALER BASIN		

DIAMOND MOUNTAIN RESOURCE AREA

Resource Management Plan
February 1993

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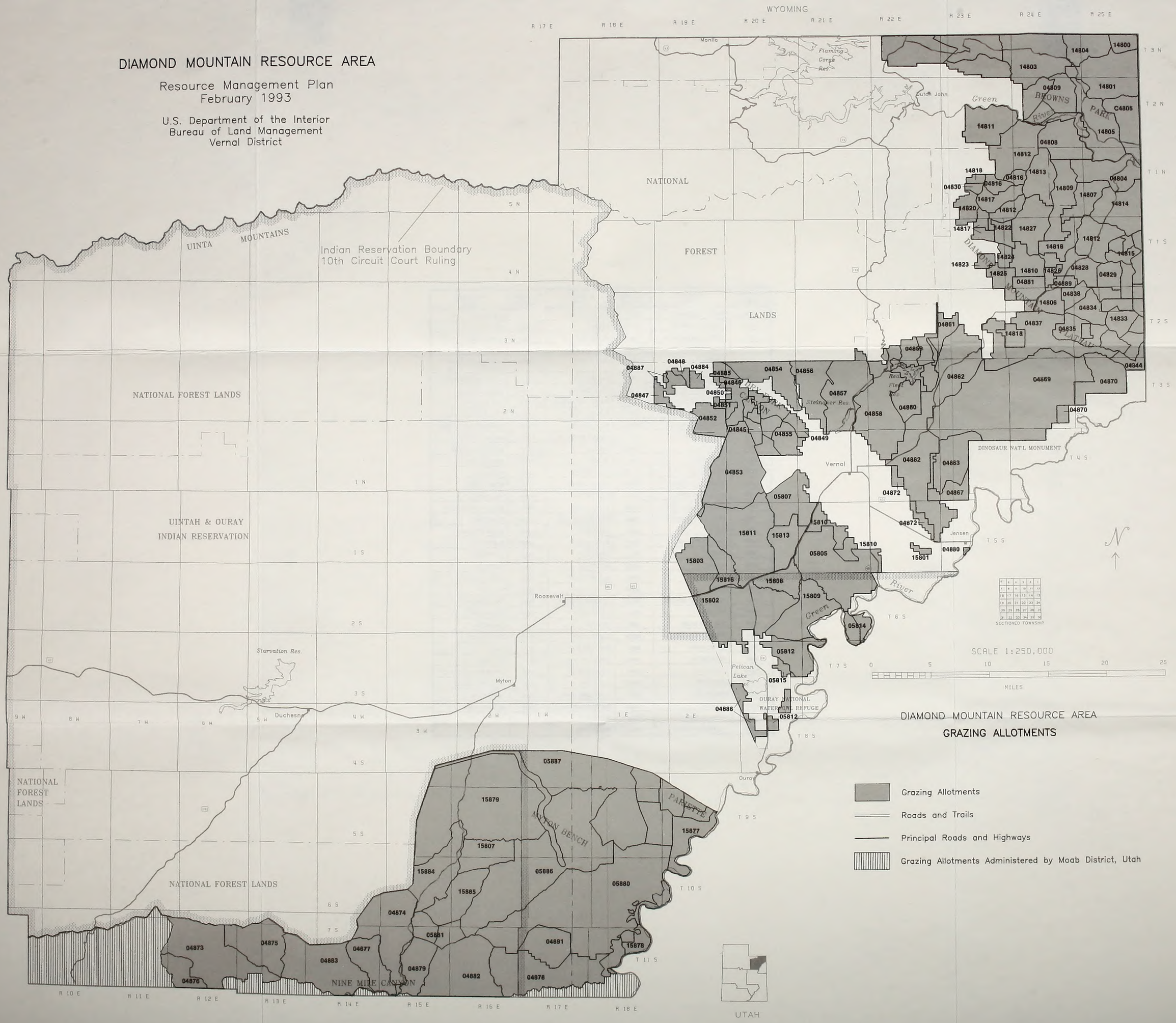

Map Packet # 3

Proposed Plan
Management Priority Area Map

DIAMOND MOUNTAIN RESOURCE AREA

Resource Management Plan
March 1993

U.S. Department of the Interior
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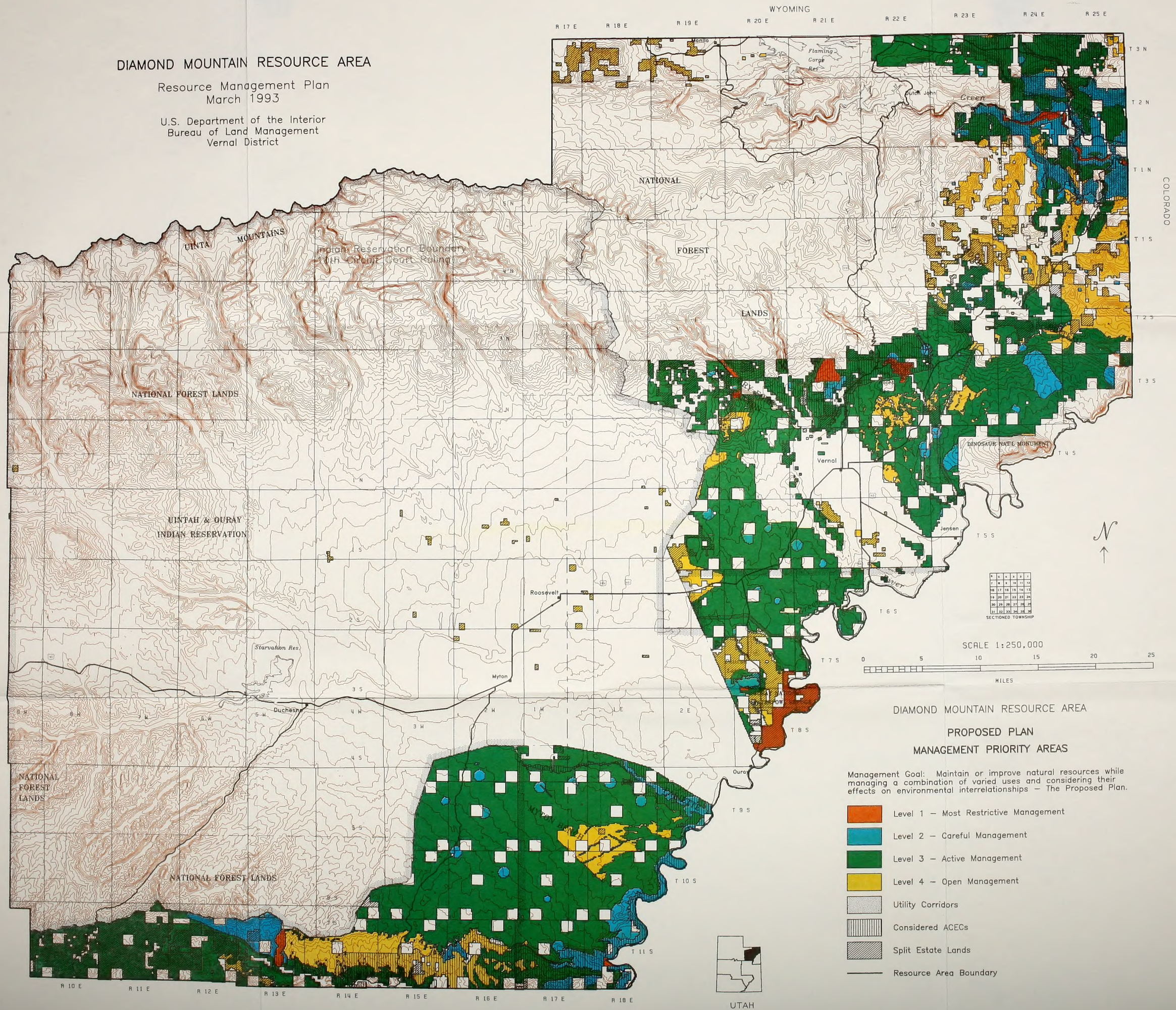

Map Packet # 4

Alternative A
Management Priority Area Map

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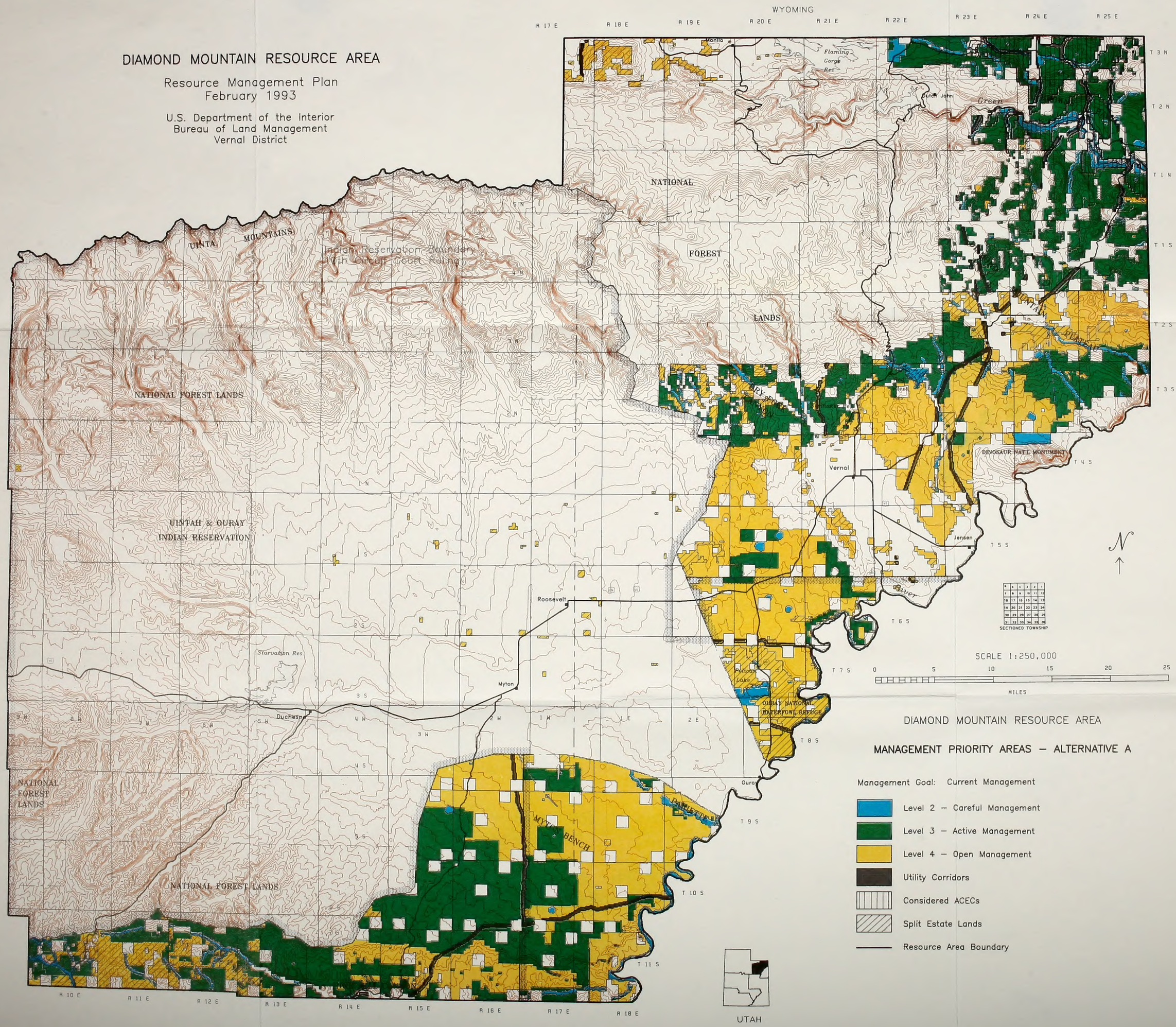

Map Packet # 5

Alternative B
Management Priority Area Map

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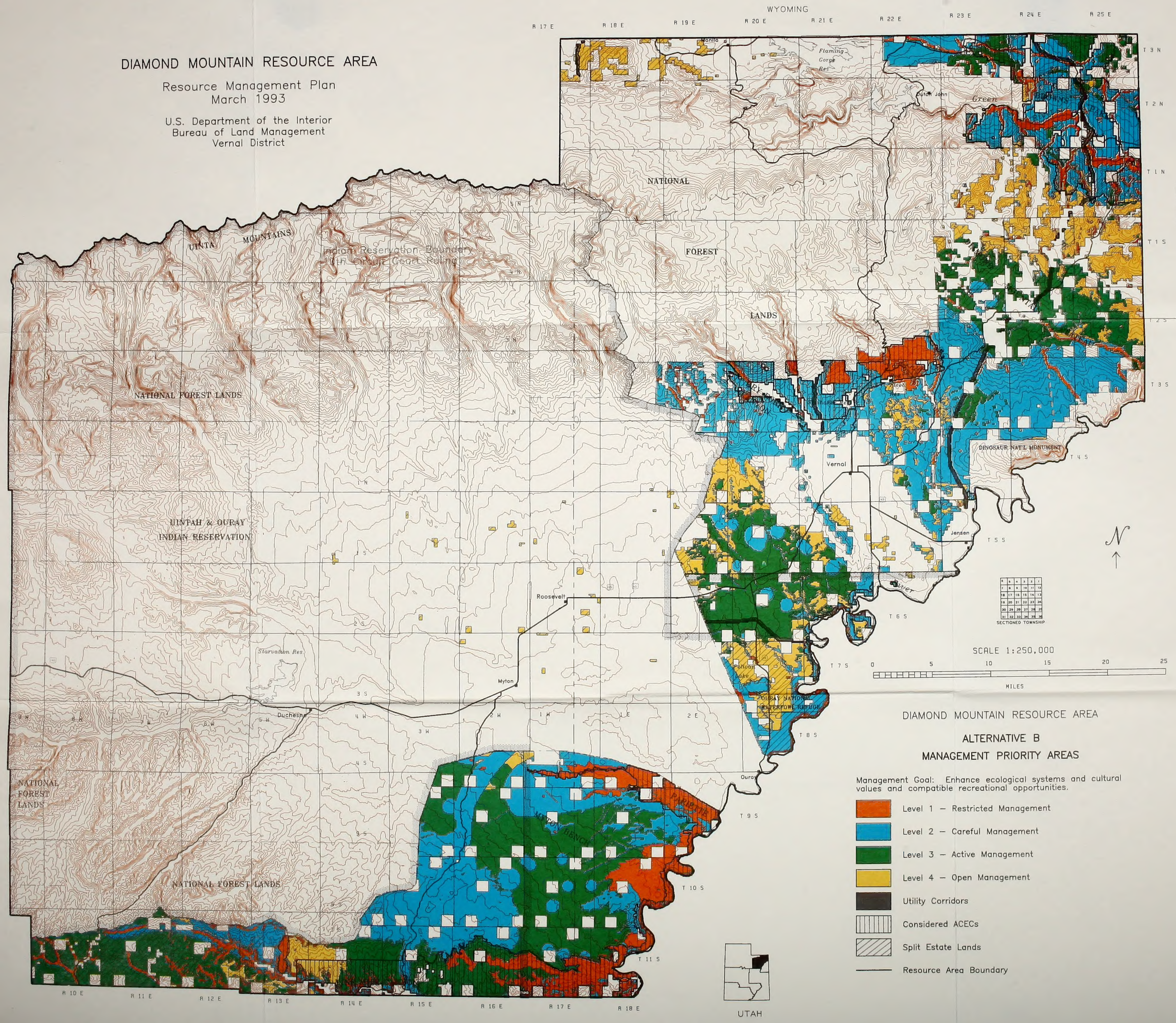

Map Packet # 6

Alternative C
Management Priority Area Map

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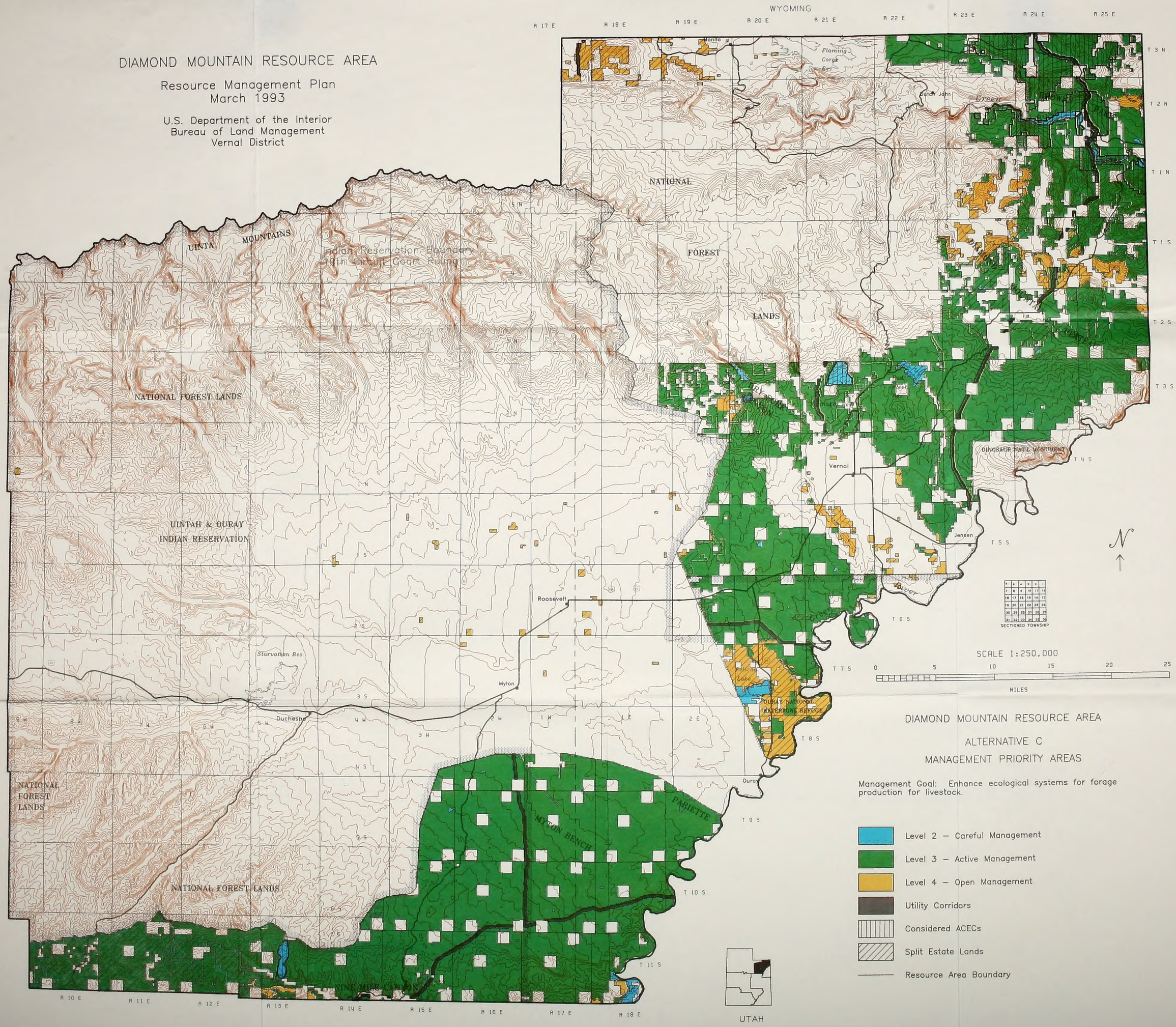

Map Packet # 7

Alternative D
Management Priority Area Map

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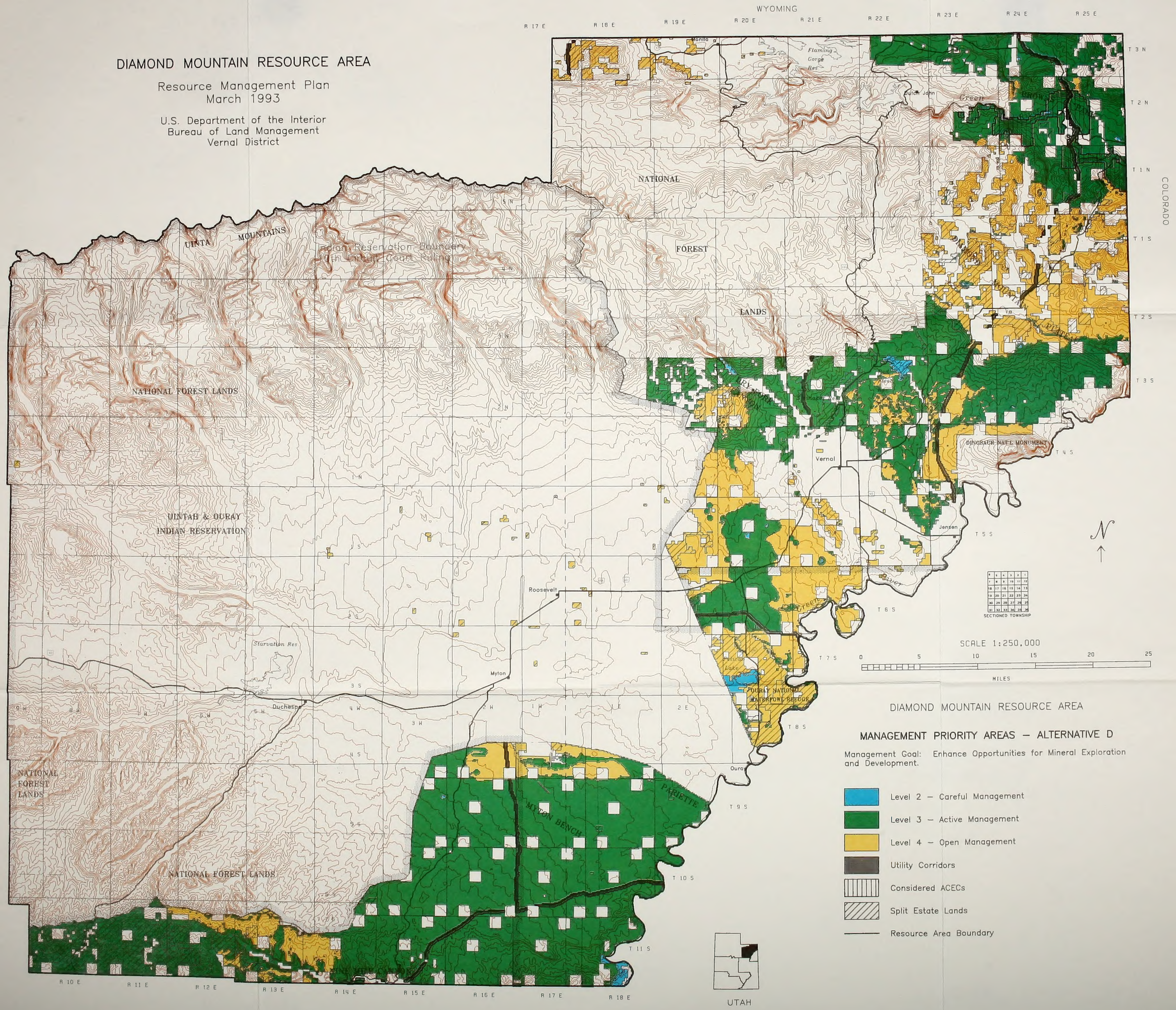

Map Packet # 8

Proposed Mineral Leasing Categories
Oil and Gas

DIAMOND MOUNTAIN RESOURCE AREA

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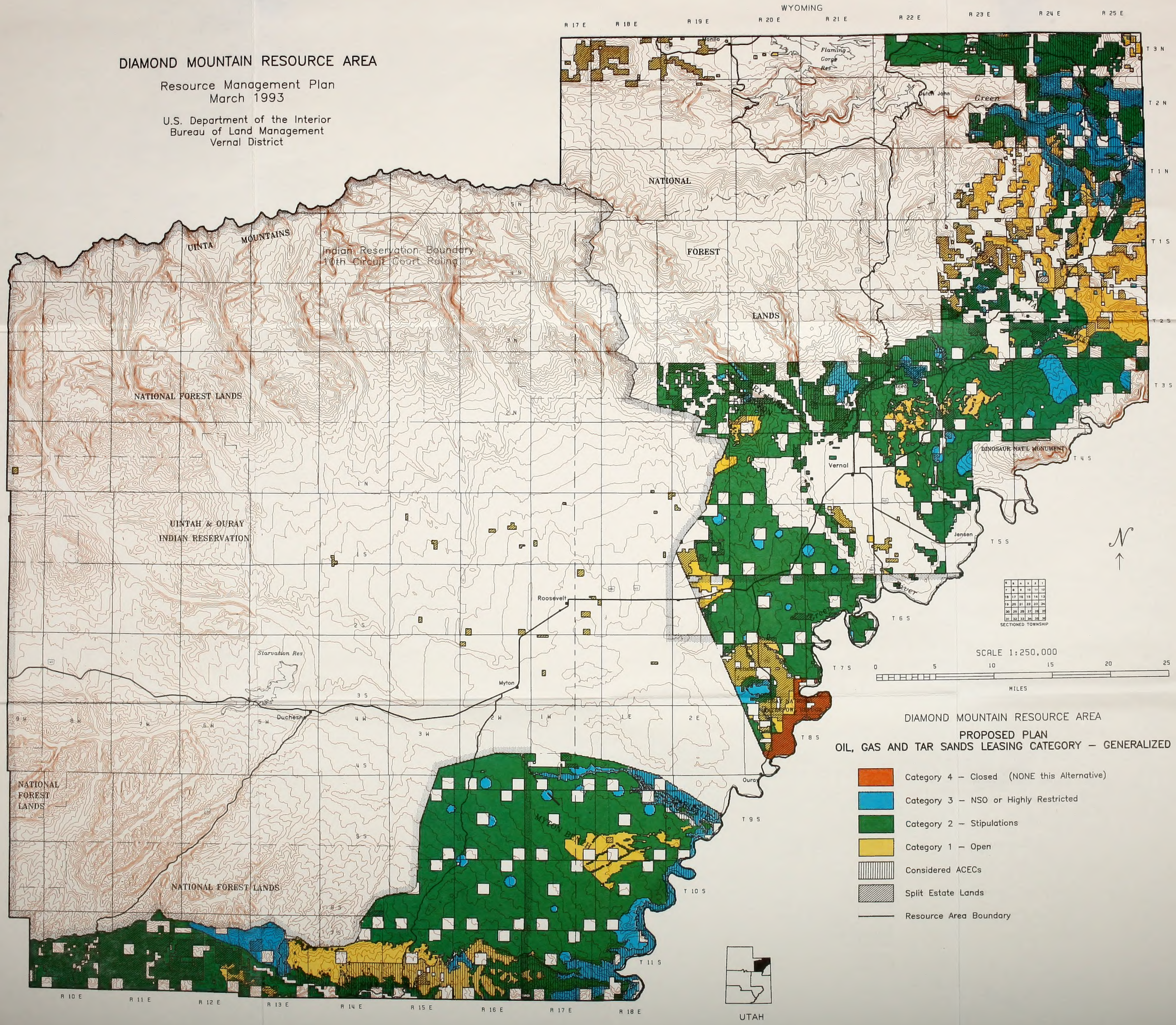

Map Packet # 9

Proposed Mineral Leasing Categories
Solid Minerals

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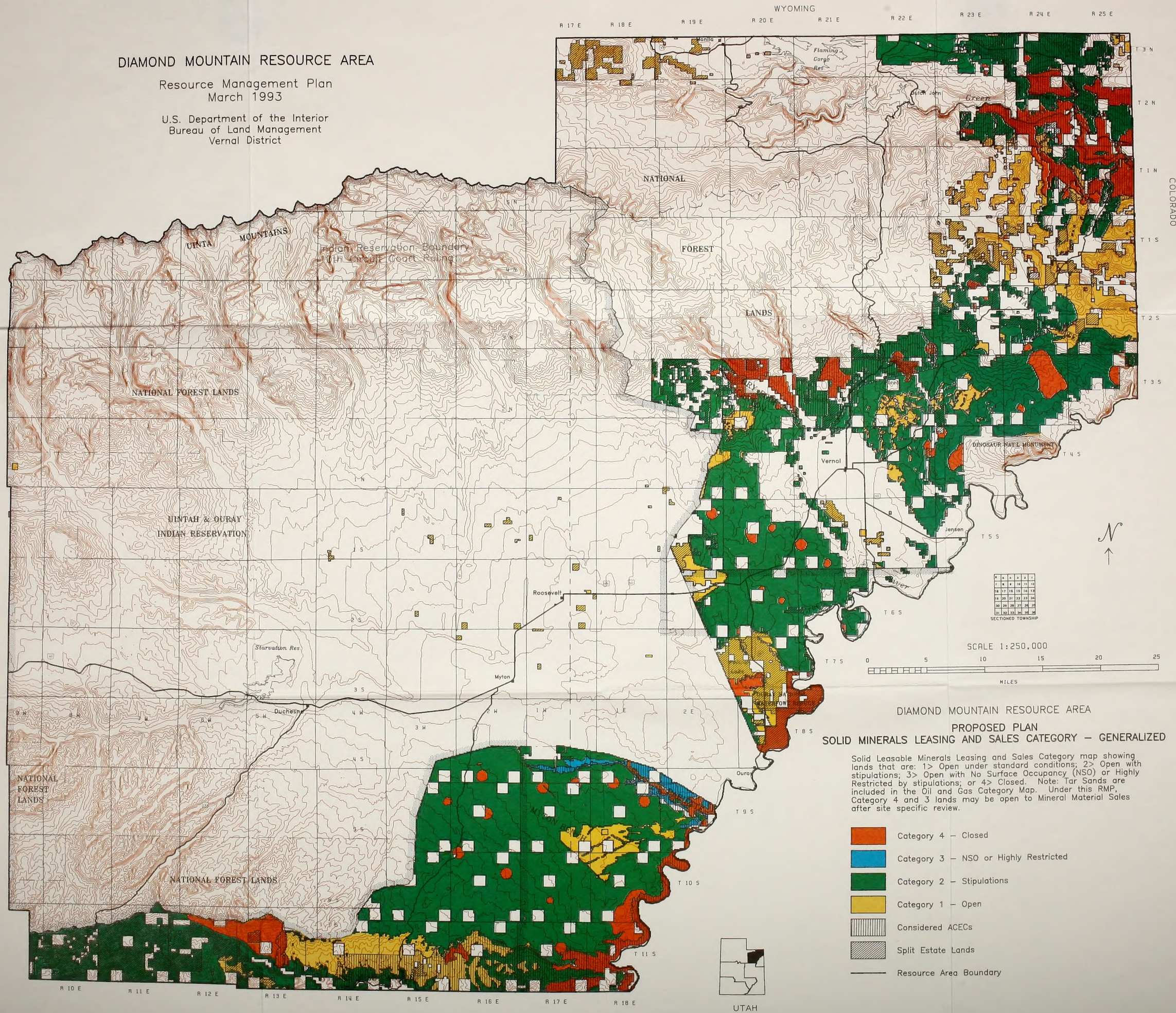

DIAMOND MOUNTAIN RESOURCE AREA

PROPOSED PLAN
SOLID MINERALS LEASING AND SALES CATEGORY – GENERALIZED

Solid Leasable Minerals Leasing and Sales Category map showing lands that are: 1> Open under standard conditions; 2> Open with stipulations; 3> Open with No Surface Occupancy (NSO) or Highly Restricted by stipulations; or 4> Closed. Note: Tar Sands are included in the Oil and Gas Category Map. Under this RMP, Category 4 and 3 lands may be open to Mineral Material Sales after site specific review.

- Category 4 – Closed
- Category 3 – NSO or Highly Restricted
- Category 2 – Stipulations
- Category 1 – Open
- Considered ACECs
- Split Estate Lands
- Resource Area Boundary

Map Packet # 10

Proposed OHV Designations

DIAMOND MOUNTAIN RESOURCE AREA

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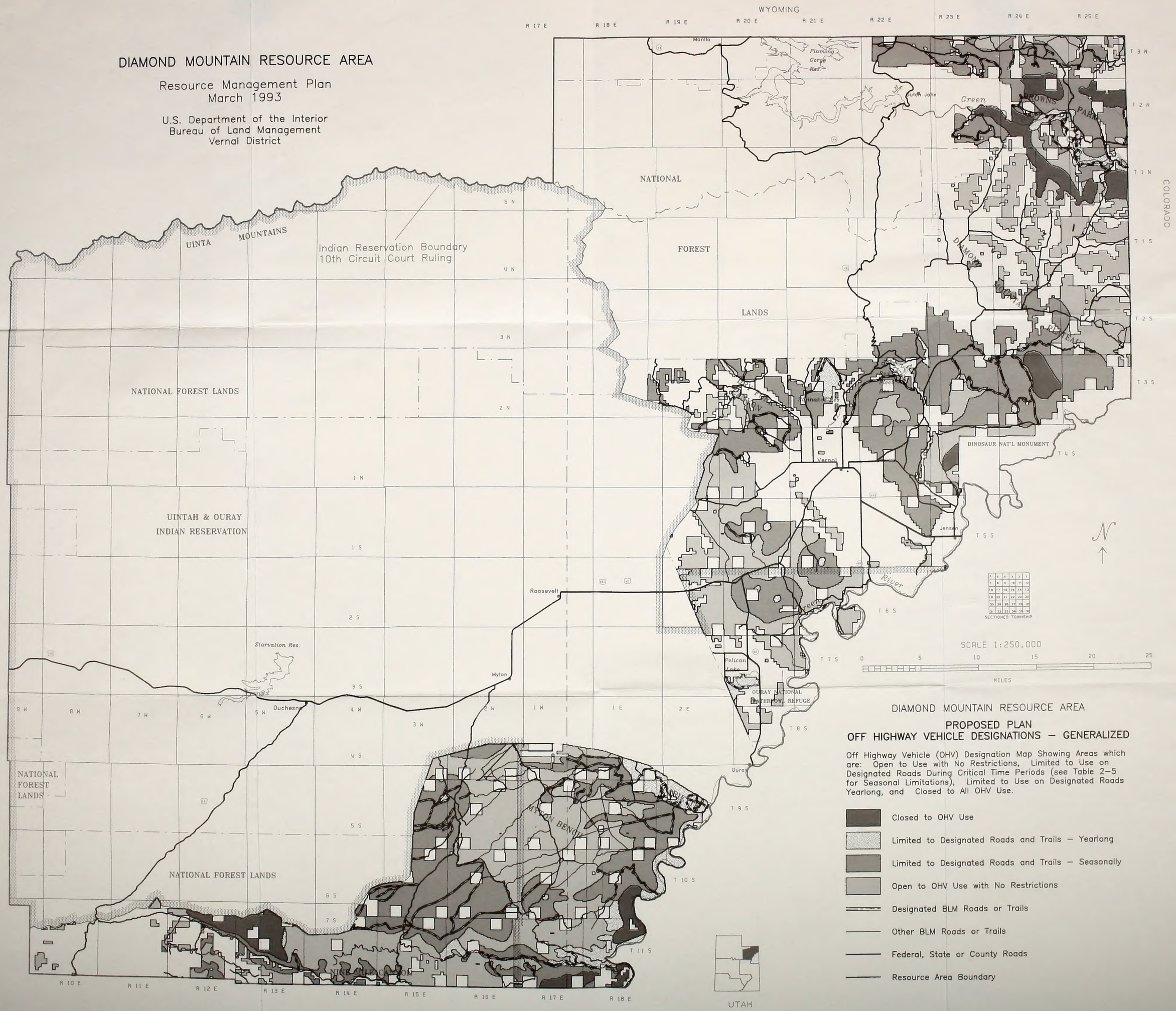

DIAMOND MOUNTAIN RESOURCE AREA

PROPOSED PLAN
OFF HIGHWAY VEHICLE DESIGNATIONS – GENERALIZED

Off Highway Vehicle (OHV) Designation Map Showing Areas which are: Open to Use with No Restrictions, Limited to Use on Designated Roads During Critical Time Periods (see Table 2–5 for Seasonal Limitations), Limited to Use on Designated Roads Yearlong, and Closed to All OHV Use.

- Closed to OHV Use
- Limited to Designated Roads and Trails – Yearlong
- Limited to Designated Roads and Trails – Seasonally
- Open to OHV Use with No Restrictions
- Designated BLM Roads or Trails
- Other BLM Roads or Trails
- Federal, State or County Roads
- Resource Area Boundary

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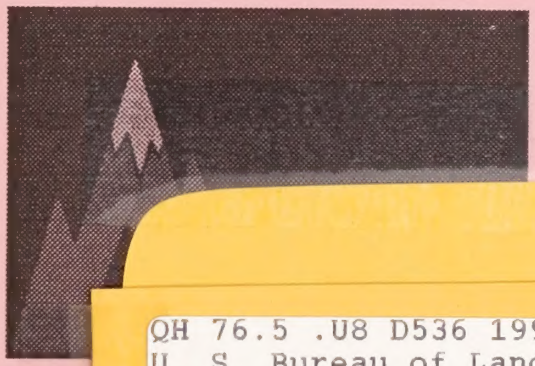

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